

# Exhibit 1

## EDDIE C. BOYD III 11/29/2018

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<p>1 IN THE UNITED STATES DISTRICT COURT 2 FOR THE EASTERN DISTRICT OF MISSOURI 3 EASTERN DIVISION 4 FRED WATSON, ) 5 Plaintiff, ) 6 vs. ) Case No. 4:17-cv-2187 RLW 7 EDDIE BOYD, ET AL., ) 8 Defendants. ) 9 10 11 THE DEPOSITION OF EDDIE C. BOYD III 12 13 14 Taken on behalf of Plaintiff 15 November 29, 2018 16 17 18 ALARIS LITIGATION SERVICES 19 711 N. 11TH STREET 20 ST. LOUIS, MO 63101 21 (314) 644-2191 22 23 24 25</p>	<p>1 Exhibit 12 .....269 2 Consent to Recommend Disciplinary 3 Punishment and Waiver of Board Trial 4 Exhibit 13 .....276 5 Incident Report 6 7 Exhibit 14 .....287 8 Release 9 Exhibit 15 .....294 10 Letter 11 12 Exhibit 16 .....296 13 Application of Employment 14 Exhibit 17 .....308 15 Performance Evaluation 16 17 Exhibit 18 .....316 18 E-mails 19 Exhibit 19 .....330 20 E-mails 21 22 Exhibit 20 .....341 23 Collection of Documents 24 Exhibit 21 .....351 25 Regional Justice Information 26 27 Exhibit 22 .....369 28 Notice of Deposition 29 30 The original exhibits were retained by the court reporter 31 to be attached to COUNSELS' transcripts. 32 33 34 35</p>
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<p>1 INDEX OF EXAMINATION 2 3 WITNESS: EDDIE C. BOYD III 4 Examination By Mr. Waldron .....6 5 Examination By Mr. Norwood .....363 6 Examination By Mr. Waldron .....369 7 8 9 INDEX OF EXHIBITS 10 11 Exhibit 1 .....12 12 Map of Forestwood Park 13 Exhibit 2 .....100 14 Ferguson Police Department CAD Notes 15 16 Exhibit 3 .....112 17 REJIS Printout 18 Exhibit 4 .....128 19 Uniform Citations 20 21 Exhibit 5 .....186 22 Police Report 23 Exhibit 6 .....218 24 Complaint Form 25 26 Exhibit 7 .....230 27 Uniform Citation 28 Exhibit 8 .....233 29 Incident Report 30 31 Exhibit 9 .....249 32 Background Questionnaire 33 Exhibit 10 .....254 34 Employee Charges/Disposition 35 36 Exhibit 11 .....261 37 Administrative Reports Transmittal 38 Sheet 39 Sheet</p>	<p>1 IN THE UNITED STATES DISTRICT COURT 2 FOR THE EASTERN DISTRICT OF MISSOURI 3 EASTERN DIVISION 4 FRED WATSON, ) 5 Plaintiff, ) 6 vs. ) Case No. 4:17-cv-2187 RLW 7 EDDIE BOYD, ET AL., ) 8 Defendants. ) 9 10 11 THE DEPOSITION OF EDDIE C. BOYD III, 12 produced, sworn, and examined on behalf of the 13 Plaintiff, November 29, 2018, between the hours of 14 eight o'clock in the forenoon and seven o'clock in the 15 afternoon on that day, at the law offices of Lewis 16 Rice, LLC, 600 Washington Avenue, Suite 2500, St. 17 Louis, Missouri 63101, before Rebecca L. Tuggle, a 18 Registered Professional Reporter, Certified Court 19 Reporter, and Certified Shorthand Reporter within and 20 for the State of Missouri. 21 22 23 24 25</p>

1 (Pages 1 to 4)

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## EDDIE C. BOYD III 11/29/2018

<p style="text-align: right;">Page 13</p> <p>1 (Exhibit 1, Map of Forestwood Park, was 2 marked for identification.) 3 MR. NORWOOD: Just for the record, are we 4 calling it Boyd Exhibit 1, just so I can -- 5 MR. WALDRON: So I've marked it as -- as 6 Plaintiff's Exhibit 1. 7 MR. NORWOOD: Plaintiff's Exhibit 1. 8 MR. WALDRON: Is that all right? 9 MR. NORWOOD: I think we have some 10 Plaintiff's Exhibit 1's, but that's fine. 11 MR. WALDRON: Okay. 12 <b>Q (By Mr. Waldron) All right. So,</b> 13 <b>Officer Boyd, do you recognize this?</b> 14 A The writing on it says "Forestwood Park." 15 <b>Q Okay. And it appears to be a satellite</b> 16 <b>photograph; is that right?</b> 17 A Yes, it appears to be a satellite photo. 18 <b>Q And do you see at the -- at the bottom</b> 19 <b>left-hand part where it says "Ferguson Avenue"?</b> 20 A I got mine. So it'd be the top right. This 21 is where it makes sense for me. 22 <b>Q Oh, okay. So you're going to flip?</b> 23 A Yes. 24 <b>Q All right. I see. So I'm going to flip</b> 25 <b>mine as well so that we're on the same page, so to</b></p>	<p style="text-align: right;">Page 15</p> <p>1 A I do. 2 <b>Q Okay. So I'm asking you to -- can you tell</b> 3 <b>me the very first thing you recall about the -- the</b> 4 <b>incident?</b> 5 A On August 1st? 6 <b>Q Yes, sir.</b> 7 A 2012? 8 <b>Q Yes, sir.</b> 9 A With Mr. Watson? 10 <b>Q Yes, sir.</b> 11 A I observed his vehicle backed into a parking 12 space in the park along a tree line with the 13 headlights on and the engine idling, heavy tinted 14 windows. 15 <b>Q Okay. And where were you when you observed</b> 16 <b>that?</b> 17 A I was in my patrol vehicle. 18 <b>Q Okay. And were you driving your patrol</b> 19 <b>vehicle?</b> 20 A Yes. 21 <b>Q Okay. And do you recall where he was in --</b> 22 <b>in Forestwood Park? Where his car was parked?</b> 23 A About a third of the way down -- halfway 24 down the eastern parking spaces -- 25 <b>Q I'm going to --</b></p>
<p style="text-align: right;">Page 14</p> <p>1 speak. 2 MR. NORWOOD: Literally and figuratively. 3 MR. WALDRON: That's right. 4 <b>Q (By Mr. Waldron) Okay. So you see Ferguson</b> 5 <b>Avenue and that's in the upper right-hand corner of</b> 6 <b>your page; is that correct?</b> 7 A Yes. 8 <b>Q And having looked at this, does this align</b> 9 <b>with what you know about Forestwood Park?</b> 10 A It appears to. 11 <b>Q It appears to. Okay.</b> 12 <b>So on August 1st of 2012, do you remember</b> 13 <b>any specific incidents before your interaction with my</b> 14 <b>client Mr. Watson?</b> 15 A No. 16 <b>Q Do you remember whether you had made any</b> 17 <b>arrests previously?</b> 18 A No. 19 <b>Q Okay. I'd like you to describe for me what</b> 20 <b>your recollection is of your interaction with</b> 21 <b>Mr. Watson.</b> 22 A I don't understand the question. 23 <b>Q So I want you -- I'm asking you to please</b> 24 <b>describe -- do you recall having interaction with my</b> 25 <b>client Fred Watson, who's here at the table?</b></p>	<p style="text-align: right;">Page 16</p> <p>1 A -- of the park. 2 <b>Q I'm going to hand you a black pen. And I'm</b> 3 <b>just going to ask you to mark with an X, please, as</b> 4 <b>best you can -- I understand it's a color</b> 5 <b>photograph -- but as best you can, I'm going to just</b> 6 <b>ask you to mark with an X where Mr. Watson's car was</b> 7 <b>parked on that day.</b> 8 A Can I do a circle? 9 <b>Q Sure. I was going to have something else be</b> 10 <b>a circle, but a circle is fine.</b> 11 MR. WALDRON: I note that, for the record, 12 Mr. Boyd is making a circle. 13 <b>Q (By Mr. Waldron) If you wouldn't mind,</b> 14 <b>Mr. Boyd, if you would just turn it around so I could</b> 15 <b>also see it. Thank you. And I'm just going to make a</b> 16 <b>similar marking so I understand where we're talking</b> 17 <b>about.</b> 18 MR. WALDRON: Got it? 19 <b>Q (By Mr. Waldron) Okay. So now that we know</b> 20 <b>where we're talking about, you said that you observed</b> 21 <b>his vehicle headlights on, heavy tint. And after you</b> 22 <b>observed this, what did you do?</b> 23 A Well, the vehicle was idling. 24 <b>Q The vehicle was idling?</b> 25 A Yes.</p>

4 (Pages 13 to 16)

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<p>1 Q Okay. And how were you able to tell that?</p> <p>2 A Once I approached it.</p> <p>3 Q Okay. So you -- you didn't determine that</p> <p>4 the vehicle was idling until you approached the car?</p> <p>5 A The headlights were on.</p> <p>6 Q Right. I -- I understand that. But you --</p> <p>7 you didn't under -- you didn't recognize that the car</p> <p>8 was idling until you approached it; right?</p> <p>9 A Yes.</p> <p>10 Q Okay. So explain to me -- you said you</p> <p>11 know -- you recognize -- you observed his vehicle, I</p> <p>12 believe were your words, and what did you then do</p> <p>13 after you observed his vehicle?</p> <p>14 A Well, I observed the vehicle backed into a</p> <p>15 parking space along the tree line with heavy tinted</p> <p>16 windows and no front plate.</p> <p>17 Q And then what did you do?</p> <p>18 A I observed that it was -- the headlights</p> <p>19 were on, it was idling, and it was in proximity to the</p> <p>20 playground.</p> <p>21 Q Okay. And how far was it from the</p> <p>22 playground?</p> <p>23 A Approximately 20 to 40 feet.</p> <p>24 Q Twenty to 40 feet?</p> <p>25 A Yeah.</p>	<p>1 A I stopped my vehicle adjacent to the</p> <p>2 vehicle.</p> <p>3 Q And what do you mean by "adjacent"?</p> <p>4 A If you were sitting in the vehicle, it would</p> <p>5 be slightly off to the left, in the driveway.</p> <p>6 Q Slightly off to the left?</p> <p>7 A Yes, at an angle.</p> <p>8 Q Would a person driving Mr. Watson's car be</p> <p>9 able to get out of his parking spot were he to -- if</p> <p>10 he were to want to?</p> <p>11 A Yes.</p> <p>12 Q Okay. So you weren't blocking him in?</p> <p>13 A No.</p> <p>14 Q Okay. And why did you park your car off to</p> <p>15 the left of Mr. Watson's car?</p> <p>16 A Officer safety. In case somebody engaged</p> <p>17 me, I would have cover.</p> <p>18 Q Okay. So -- so you parked your car there</p> <p>19 for protection?</p> <p>20 A Yes.</p> <p>21 Q Did you intend, at this point, to conduct</p> <p>22 a -- a -- to engage Mr. Watson?</p> <p>23 A I didn't know the vehicle was occupied until</p> <p>24 I actually exited my vehicle and walked up on the</p> <p>25 vehicle and saw somebody moving around in it.</p>
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<p>1 Q So the playground was directly across</p> <p>2 from --</p> <p>3 A Adjacent.</p> <p>4 Q Adjacent?</p> <p>5 A Yes.</p> <p>6 Q And, I guess, looking at this, can you help</p> <p>7 me explain what does "adjacent" mean?</p> <p>8 A It would be off -- if you were sitting in</p> <p>9 the vehicle while it was backed in, it would be off to</p> <p>10 the right --</p> <p>11 Q Off to the --</p> <p>12 A -- slightly off to the right.</p> <p>13 Q Okay. And it would be about 20 to 40 feet</p> <p>14 to the right?</p> <p>15 A Just on the other side of the pathway.</p> <p>16 Q On the other side of the pathway.</p> <p>17 And it's a jungle gym? Is it a --</p> <p>18 A It's a mixture of things.</p> <p>19 Q It's a mixture of things. Okay.</p> <p>20 So you said that you made these</p> <p>21 observations; correct?</p> <p>22 A Yes.</p> <p>23 Q You made -- you made a series of</p> <p>24 observations which you've told me about. What</p> <p>25 happened after you made the observations?</p>	<p>1 Q Okay. So you didn't know the vehicle was</p> <p>2 occupied; is that correct?</p> <p>3 A Until I walked up on the vehicle and</p> <p>4 observed somebody moving around in it.</p> <p>5 Q But you noticed that the headlights were on?</p> <p>6 A Yes.</p> <p>7 Q And I can't remember, did you notice whether</p> <p>8 or not the car was idling before you got out of your</p> <p>9 car?</p> <p>10 A After I got out of the -- after I got upon</p> <p>11 the car because I believe I rolled my window down.</p> <p>12 Q You -- okay. So you didn't recognize that</p> <p>13 the car was occupied. And you pulled your car up to</p> <p>14 the left -- slightly off to the left. What do you do</p> <p>15 next?</p> <p>16 A I exit my vehicle --</p> <p>17 Q Okay.</p> <p>18 A -- and I attempt to get the VIN information</p> <p>19 off the vehicle.</p> <p>20 Q Okay. So would you have entered anything</p> <p>21 into a computer?</p> <p>22 A At that point?</p> <p>23 Q Yes.</p> <p>24 A There was nothing to enter.</p> <p>25 Q Okay. You did not enter anything into --</p>

5 (Pages 17 to 20)



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<p style="text-align: right;">Page 25</p> <p>1       <b>Q</b> And why did you exit your vehicle?</p> <p>2       A To get the VIN.</p> <p>3       <b>Q</b> Okay. And you wanted to know the VIN number</p> <p>4 because you wanted -- because the vehicle didn't have</p> <p>5 a license plate as you said; correct?</p> <p>6       A It did not have a front plate.</p> <p>7       <b>Q</b> It did not have a front plate. Thank you.</p> <p>8 And why did you want to know whether it had a -- why</p> <p>9 did you want to know what -- what the license was for</p> <p>10 the car?</p> <p>11       A Because the vehicle had heavily tinted</p> <p>12 windows.</p> <p>13       <b>Q</b> And what's the significance of that?</p> <p>14       A It's vision-reducing material applied to the</p> <p>15 front windshield, and it had it applied to the</p> <p>16 windows, which is a violation of the state statute and</p> <p>17 Ferguson ordinance.</p> <p>18       <b>Q</b> Okay. And did you realize that before you</p> <p>19 parked your car where you did?</p> <p>20       A Yes.</p> <p>21       <b>Q</b> You did. And what was that you saw before</p> <p>22 you parked your car?</p> <p>23       A A vehicle backed into a parking space along</p> <p>24 the tree line with no front plate and heavily tinted</p> <p>25 windows.</p>	<p style="text-align: right;">Page 27</p> <p>1       <b>Q</b> But you didn't know that yet. You didn't</p> <p>2 know that the vehicle was idling before you pulled up;</p> <p>3 right?</p> <p>4       A Before --</p> <p>5       MS. ARRINDELL: I'm going to object. Asked</p> <p>6 and answered.</p> <p>7       But continue.</p> <p>8       A Yeah. Before I pulled up, no.</p> <p>9       <b>Q</b> (By Mr. Waldron) Okay. So the factors that</p> <p>10 you listed are that the vehicle is backed in; correct?</p> <p>11       A Yes.</p> <p>12       <b>Q</b> That there was no front plate; correct?</p> <p>13       A Yes.</p> <p>14       <b>Q</b> There were headlights -- the headlights were</p> <p>15 on; correct?</p> <p>16       A Yes.</p> <p>17       <b>Q</b> And that there was heavily tinted windshield</p> <p>18 and windows?</p> <p>19       A Yes.</p> <p>20       <b>Q</b> Okay. Any other factors?</p> <p>21       A Adjacent to a playground.</p> <p>22       <b>Q</b> Adjacent to a playground. And so you</p> <p>23 described for me already what the significance of a</p> <p>24 heavily tinted windshield and windows could be.</p> <p>25       Would you describe the significance of a car</p>
<p style="text-align: right;">Page 26</p> <p>1       <b>Q</b> Okay. And I just want to be clear. So what</p> <p>2 were the -- you've mentioned so far the tinted</p> <p>3 windshield and windows as the reason why you decided</p> <p>4 to park your car. Would you describe for me what the</p> <p>5 significance of the other details that you've repeated</p> <p>6 a couple times are?</p> <p>7       MR. NORWOOD: Objection --</p> <p>8       MS. ARRINDELL: Objection. I believe it</p> <p>9 states facts not in evidence. I don't think he</p> <p>10 testified to the windows. He testified to the</p> <p>11 windshield.</p> <p>12       <b>Q</b> (By Mr. Waldron) Okay. Subject to that.</p> <p>13       A I don't -- repeat the question.</p> <p>14       <b>Q</b> Okay. You repeated a couple times there's a</p> <p>15 car backed in, no front license plate, headlights on.</p> <p>16 Did those factors -- did -- did those things factor</p> <p>17 into your decision to park your car where you did?</p> <p>18       A The vehicle backed in along the tree line,</p> <p>19 with the window tint, heavily -- heavily tinted and no</p> <p>20 front plate. Those were the contributing factors.</p> <p>21       <b>Q</b> Okay.</p> <p>22       A Some of them, yes.</p> <p>23       <b>Q</b> Okay. What -- what were other ones?</p> <p>24       A It was parked adjacent to a playground, the</p> <p>25 headlights were on, the vehicle was idling.</p>	<p style="text-align: right;">Page 28</p> <p>1 that's backed in?</p> <p>2       A A few instances, people back in when they're</p> <p>3 planning on doing something illegal. It makes it</p> <p>4 easier to get away.</p> <p>5       <b>Q</b> Okay. Have you -- you've seen that in your</p> <p>6 experience as an officer?</p> <p>7       A Yes.</p> <p>8       <b>Q</b> So a car that's backed in is, to you, more</p> <p>9 suspicious?</p> <p>10       A Not more suspicious. It's more than just</p> <p>11 being backed in.</p> <p>12       <b>Q</b> Okay. But it's a factor. It's more</p> <p>13 suspicious than a car that's not backed in; is that</p> <p>14 correct?</p> <p>15       A I wouldn't say that. No.</p> <p>16       <b>Q</b> All right. Because you listed -- I -- I</p> <p>17 believe we talked about the factors of why you decided</p> <p>18 to pull your car up in front of Mr. Watson's car. And</p> <p>19 one of the things you listed was that it was backed</p> <p>20 in. I'm just trying to determine whether or not the</p> <p>21 fact that it was backed in contributed to why you</p> <p>22 pulled up. Did it?</p> <p>23       A That was one of the minor factors.</p> <p>24       <b>Q</b> Okay. So it was a minor factor?</p> <p>25       A Yes.</p>

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<p style="text-align: right;">Page 33</p> <p>1 MS. ARRINDELL: Excuse me.</p> <p>2 A With their headlights on?</p> <p>3 Q (By Mr. Waldron) Yes.</p> <p>4 A It could mean multiple things.</p> <p>5 Q And I'm asking you to explain what it might</p> <p>6 mean. Give me one or two.</p> <p>7 A Maybe somebody is starting the car to heat</p> <p>8 it up, cool it down.</p> <p>9 Q Okay. So that wouldn't cause any suspicion;</p> <p>10 right?</p> <p>11 A Having an unattended motor vehicle running?</p> <p>12 Q If -- if the car was unattended.</p> <p>13 A I mean, it just depends because people start</p> <p>14 their cars and run them for several reasons.</p> <p>15 Q Right, right, right. Can you give me an</p> <p>16 example of a time when the headlights running would</p> <p>17 cause suspicion for you -- the headlights being on</p> <p>18 would cause suspicion?</p> <p>19 A Suspicion?</p> <p>20 Q Yes.</p> <p>21 A I mean, it wouldn't necessarily cause</p> <p>22 suspicion. It just depends on the other circumstances</p> <p>23 surrounding, you know, that individual case.</p> <p>24 Q So the headlights on their own would not</p> <p>25 contribute to suspicion. The other factors might. Is</p>	<p style="text-align: right;">Page 35</p> <p>1 because the headlights are on?</p> <p>2 A I don't understand the question. Could you</p> <p>3 rephrase it?</p> <p>4 Q When you're patrolling, you make</p> <p>5 determinations when to stop and get out and</p> <p>6 investigate something. Is that true?</p> <p>7 A I do.</p> <p>8 Q Okay. And what I'm trying to determine is</p> <p>9 would a vehicle's headlights being on, would it be a</p> <p>10 factor that would cause you to stop and get out and</p> <p>11 make an investigation?</p> <p>12 A Just for the headlights being on?</p> <p>13 Q Yes.</p> <p>14 A No, not necessarily.</p> <p>15 Q Okay. And explain to me what the -- what</p> <p>16 the significance was of the fact that the vehicle was</p> <p>17 adjacent to the playground.</p> <p>18 A There were children playing and people in</p> <p>19 the park that day.</p> <p>20 Q Okay. And what's the -- help me understand</p> <p>21 what that -- what the significance is of the fact that</p> <p>22 there was a car near children or where children are</p> <p>23 playing.</p> <p>24 A Well, I mean, if someone's sitting, backed</p> <p>25 in, with heavy tinted windows, you would want to find</p>
<p style="text-align: right;">Page 34</p> <p>1 that fair to say?</p> <p>2 MR. NORWOOD: Let me object to that. I</p> <p>3 think that mischaracterizes what he testified to.</p> <p>4 A Rephrase the question.</p> <p>5 Q (By Mr. Waldron) The headlights on their own</p> <p>6 would not contribute -- is it fair to say that the</p> <p>7 headlights on their own wouldn't contribute to any</p> <p>8 suspicion, but external other factors would?</p> <p>9 MR. NORWOOD: Same objection.</p> <p>10 MS. ARRINDELL: I join in the objection.</p> <p>11 MR. WALDRON: Okay. So just going forward</p> <p>12 so that we're clear, I think one objection -- I'm okay</p> <p>13 with either of you objecting. I think -- I don't</p> <p>14 think that it's necessary for us to do both just in</p> <p>15 terms of fluidity. If that's all right?</p> <p>16 MR. NORWOOD: Well, I represent the City. I</p> <p>17 don't represent Mr. Boyd. And so I'm going to object</p> <p>18 when I think it's proper on behalf of the City. And I</p> <p>19 don't control Ms. Arrindell and her client and how she</p> <p>20 objects.</p> <p>21 MR. WALDRON: Okay.</p> <p>22 Q (By Mr. Waldron) So, Mr. Boyd, what I'm</p> <p>23 trying to determine is this. Are there any</p> <p>24 circumstances in which your suspicion is raised when</p> <p>25 you approach a car or when you see a vehicle just</p>	<p style="text-align: right;">Page 36</p> <p>1 out if they're watching the kids or, you know, if</p> <p>2 there's any other criminal activity afoot besides the</p> <p>3 ordinance violations.</p> <p>4 Q Okay. And so the proximity to the</p> <p>5 children -- the fact that the car was close to the</p> <p>6 children was important because you were concerned for</p> <p>7 the children's sake?</p> <p>8 A I didn't say that.</p> <p>9 Q Okay. I'm just trying to understand how</p> <p>10 did -- how did the kids being -- how did the presence</p> <p>11 of the kids -- why was that one of the factors that</p> <p>12 you've listed?</p> <p>13 A That's just something that comes up when you</p> <p>14 think about a car backed into a parking space with</p> <p>15 heavily tinted windows.</p> <p>16 Q And -- and what's the relationship -- you've</p> <p>17 mentioned a couple times the heavily tinted windows.</p> <p>18 What's the relationship between the children being</p> <p>19 there and the heavily tinted windows?</p> <p>20 A Heavily tinted windows is an ordinance</p> <p>21 violation.</p> <p>22 Q Okay. And what's the connection between</p> <p>23 that and -- and the children being there?</p> <p>24 A I didn't know. I wanted to find out if</p> <p>25 there was a connection there.</p>

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<p>1 Q Okay. Okay. So I know we've sort of been</p> <p>2 slowing down, but I'm going to ask that we sort of</p> <p>3 continue in the narrative.</p> <p>4 I believe you've gotten out of your car, you</p> <p>5 testified, and that you began to look for the vehicle</p> <p>6 identification number; is that correct?</p> <p>7 A To look at it, yes.</p> <p>8 Q Okay. And what happened next?</p> <p>9 A I saw somebody moving around in the vehicle.</p> <p>10 Q Okay. And how did you see that?</p> <p>11 A I was like up against the window.</p> <p>12 Q You were?</p> <p>13 A No. Well, yeah, because I was trying to get</p> <p>14 the VIN.</p> <p>15 Q Okay. So you were up against the windshield</p> <p>16 or against the window?</p> <p>17 A The windshield.</p> <p>18 Q And how far away were you from the</p> <p>19 windshield?</p> <p>20 A Less than a foot.</p> <p>21 Q Less than a foot. And the windshield was</p> <p>22 heavily tinted; is that right?</p> <p>23 A Yes.</p> <p>24 Q Okay. And was the -- were any of the car</p> <p>25 windows open?</p>	<p>1 A The window was lowered part of the way.</p> <p>2 Q Okay. And did you request the window be</p> <p>3 lowered or was the window just lowered?</p> <p>4 A I don't recall.</p> <p>5 Q Okay. So you don't know whether you said,</p> <p>6 "roll your window down," or whether the person in the</p> <p>7 car just rolled their window down?</p> <p>8 A I don't recall.</p> <p>9 Q Okay. And after the window was lowered, you</p> <p>10 made contact with Mr. Watson, you testified. What</p> <p>11 happened?</p> <p>12 A I advised him of the violations and</p> <p>13 observations.</p> <p>14 Q Okay.</p> <p>15 A And requested a driver's license and proof</p> <p>16 of insurance.</p> <p>17 Q Okay. So you advised him of violations and</p> <p>18 what was the other word?</p> <p>19 A Requested driver's license and proof of</p> <p>20 insurance.</p> <p>21 Q No, I apologize. I believe you said you</p> <p>22 advised him of violations and --</p> <p>23 A Observations.</p> <p>24 Q -- observations. Okay. So let's go into</p> <p>25 that. What did you advise him of?</p>
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<p>1 A I don't believe so.</p> <p>2 Q Do you remember?</p> <p>3 A No. I don't recall exactly if they -- they</p> <p>4 weren't open, no.</p> <p>5 Q None of the windows were open?</p> <p>6 A Not the front two.</p> <p>7 Q Were the back two?</p> <p>8 A No, I don't think so.</p> <p>9 Q Okay. So the front two windows aren't open,</p> <p>10 the back two windows aren't open?</p> <p>11 A No, I don't believe so.</p> <p>12 Q Okay. They're all the way up?</p> <p>13 A Yes.</p> <p>14 Q Okay. And I believe in the narrative, we're</p> <p>15 at the point where you said you stuck your foot</p> <p>16 about -- you stuck your head -- excuse me -- about one</p> <p>17 foot away from the vehicle identification number.</p> <p>18 What happened next?</p> <p>19 A I'd have to refer to my report, but I</p> <p>20 believe that's when contact was made with Mr. Watson.</p> <p>21 Q Okay. That's when contact was made. And in</p> <p>22 what way was contact made?</p> <p>23 A We began talking.</p> <p>24 Q And how did that -- how did you come to</p> <p>25 recognize that Mr. Watson was there?</p>	<p>1 A It would have been the ordinance violations.</p> <p>2 Q Which -- so you're saying several</p> <p>3 violations?</p> <p>4 A The ordinance violations.</p> <p>5 Q Okay. So what violation -- and -- and what</p> <p>6 violations did you advise him of?</p> <p>7 A The window tint and I believe no front</p> <p>8 plate.</p> <p>9 Q Okay. And do you remember what you said?</p> <p>10 A I do not.</p> <p>11 Q Okay. But from your -- I'm trying to</p> <p>12 determine here, is this what you recall or is this</p> <p>13 what you recall after reviewing documents in the case</p> <p>14 of preparing for this deposition?</p> <p>15 A Reviewing the documents.</p> <p>16 Q Okay. So do you have any recollection -- if</p> <p>17 I were to have asked you, for example, a month ago,</p> <p>18 would you have remembered what the answer to what --</p> <p>19 what your conversation was like when you approached</p> <p>20 Mr. Watson?</p> <p>21 A I don't -- I don't know if I would remember</p> <p>22 that a month ago.</p> <p>23 Q Okay. So when you're testifying here,</p> <p>24 you're testifying based on what you've read in your</p> <p>25 report; is that correct?</p>

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<p>1 A Yes.</p> <p>2 Q Okay. So you advised him of the violations</p> <p>3 and you don't remember what you said exactly?</p> <p>4 A No.</p> <p>5 Q But the violations that you had noted at</p> <p>6 this point were tinted windows and what else?</p> <p>7 A No front plate.</p> <p>8 Q No front plate. And what's that violation?</p> <p>9 A No front plate?</p> <p>10 Q Uh-huh. What's that -- can you explain that</p> <p>11 ordinance to me?</p> <p>12 A No front plate.</p> <p>13 Q There's an ordinance in the City called "no</p> <p>14 front plate"?</p> <p>15 A One plate when two are required.</p> <p>16 Q One plate when two are required. That's the</p> <p>17 name of the city ordinance?</p> <p>18 A I'm not -- I don't recall the exact language</p> <p>19 of the ordinance.</p> <p>20 Q But the gist of it is that if there's one --</p> <p>21 if there's -- if two are required and somebody only</p> <p>22 has one plate, then you're breaking the ordinance; is</p> <p>23 that correct?</p> <p>24 A Yes.</p> <p>25 Q Okay. And are two front plates always -- or</p>	<p>1 plate; is that correct?</p> <p>2 A Yes.</p> <p>3 Q Were there any other violations that you</p> <p>4 notified him of?</p> <p>5 A I believe the seat belt violation.</p> <p>6 Q Okay. So at this time, you would have</p> <p>7 notified him of a seat belt violation?</p> <p>8 A Once he rolled down the window, yes.</p> <p>9 Q Once he rolled down the window. Okay. Any</p> <p>10 other ordinance violations that you advised him of at</p> <p>11 this point?</p> <p>12 A I would have to refer to my report.</p> <p>13 Q You'd have to refer to your report. But</p> <p>14 none that you remember?</p> <p>15 MS. ARRINDELL: Objection. Mischaracterizes</p> <p>16 testimony.</p> <p>17 A Rephrase the question.</p> <p>18 Q (By Mr. Waldron) So far you've listed tinted</p> <p>19 windows, no front plate, and seat belt violations.</p> <p>20 And these are all things that you listed as violations</p> <p>21 that you informed Mr. Watson of when you -- when he</p> <p>22 rolled his car window down; correct?</p> <p>23 A Yes, when I observed them.</p> <p>24 Q Great. And I'm trying to find out were</p> <p>25 there any other violations that you notified him of.</p>
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<p>1 excuse me -- are two license plates always required?</p> <p>2 A In the State of Missouri.</p> <p>3 Q Okay. All vehicles?</p> <p>4 A For Missouri residents.</p> <p>5 Q Okay. What about other residents?</p> <p>6 A Of Missouri?</p> <p>7 Q No. Residents of Illinois, residents of</p> <p>8 Indiana, residents of Nebraska. Are they required to</p> <p>9 have two -- two license plates?</p> <p>10 A I don't read up on Illinois, Indiana law.</p> <p>11 Q Would you be within your right -- let's say</p> <p>12 I'm driving a car with Indiana license plates and I</p> <p>13 don't have a front license plate and I only have a</p> <p>14 back license plate, could you write me a ticket for no</p> <p>15 front plate?</p> <p>16 A If I saw and observed an Indiana plate? No,</p> <p>17 I would not stop it for no front plate.</p> <p>18 Q Okay. Would you -- could you write me a</p> <p>19 ticket for no front plate?</p> <p>20 A If I saw and observed an Indiana plate, no,</p> <p>21 I would not write a ticket for no front plate.</p> <p>22 Q Okay. All right. So you advised Mr. Watson</p> <p>23 of violations, and the violations that you've told me</p> <p>24 about so far was that he had a -- you observed a tint</p> <p>25 violation and you observed that there was no front</p>	<p>1 A If he didn't produce his license and proof</p> <p>2 of insurance, those would be two additional</p> <p>3 violations.</p> <p>4 Q Was that a violation that you notified him</p> <p>5 of?</p> <p>6 A When I asked him for his license and proof</p> <p>7 of insurance, he didn't produce it; so yes.</p> <p>8 Q Okay. So I'm saying this initial</p> <p>9 conversation. I think that you're moving a little bit</p> <p>10 farther into the conversation, but correct me if I'm</p> <p>11 wrong. At this initial point, you said the first</p> <p>12 thing you do when you -- when you interacted with him,</p> <p>13 the first thing you did was you advised him of</p> <p>14 violations and observations. You advised him of three</p> <p>15 violations; correct?</p> <p>16 A It would have been a total of five with the</p> <p>17 license and proof of insurance because I would have</p> <p>18 asked for the license and proof of insurance after I</p> <p>19 advised him of the violations.</p> <p>20 Q Okay. But at the initial -- the initial</p> <p>21 conversation, you hadn't got to the point where you</p> <p>22 asked him for license or insurance yet; right?</p> <p>23 A After I advised him of the violations, I</p> <p>24 would have asked him for his license and proof of</p> <p>25 insurance.</p>

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<p>1 Q Okay. Did anything happen -- what was his 2 response when you advised him of these three 3 violations? 4 A I don't recall. 5 Q You don't remember? 6 A He was argumentative and combative, but I 7 don't recall what he was saying. 8 Q Describe for me, what is "argumentative" and 9 "combative"? What does that look like? 10 A He didn't want to cooperate. He was loud. 11 Q So his voice was raised? 12 A Yes. 13 Q Okay. What do you mean by "combative"? 14 A Would not do any of the commands that I gave 15 him as far as -- 16 Q Okay. So at -- at this point, so far my 17 understanding is that you've only advised him of 18 violations; right? So you haven't told him to do 19 anything yet, at the point we're just at the initial 20 conversation. Do you understand where I am -- where 21 we are? 22 A Yeah. When I do the initial, I advise of 23 the observations or the violations and I ask for 24 license and proof of insurance. 25 Q Okay. Right. And so when you advised him</p>	<p>1 Q Okay. And you -- you would -- would you 2 have explained what that -- what the significance was? 3 For example, I didn't understand some of those. Did 4 you explain why that was relevant? 5 A I don't recall. 6 Q Okay. So you advised him of violations and 7 observations. And then you said that he said, "I 8 didn't do anything"; correct? 9 A Yes. 10 Q Okay. What happened next? 11 A I'm pretty sure when he didn't have the 12 license and proof of insurance -- 13 Q So we haven't got to that yet. Was -- was 14 there a step -- so what I understand is that you 15 advised him of some violations. He says, "I didn't do 16 anything." At what point did you ask for his 17 identification? Before he said "I didn't do anything" 18 or after? 19 A You inserted the I don't -- he didn't do 20 anything in between the license. I walked up -- 21 Q I -- I apologize. I'm just trying to get 22 the sequence right. 23 A Yeah. Yeah. I believe you created your own 24 sequence. Because I walked up to the vehicle, was 25 trying to get the VIN, he lowered the window. And</p>
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<p>1 of the violations, was he combative? 2 A He was argumentative. 3 Q He was argumentative. And what did he 4 argue? 5 A I believe he said, "I didn't do anything." 6 Q He said, "I didn't do anything"? Did he say 7 anything else? 8 A I don't recall at this time. 9 Q Nothing else that you remember. Is that 10 fair to say? 11 A At this time. 12 Q At this time. And -- and -- and we're at 13 the early stage of the conversation; right? You also 14 said you observed -- you advised him of observations 15 that you had made. So you said you advised him of 16 violations and observations. So the violations we got 17 to, we listed three of them. 18 What were the observations that you advised 19 him of? 20 A Well, that he was backed into a parking 21 space, probably, with his headlights on, the engine 22 idling, heavy tinted windows. 23 Q So you told him all of those things? 24 A I don't recall, but those would have been 25 the observations that I advised him of.</p>	<p>1 then at that point, I advised him of the violations 2 and observations and then asked for his license and 3 proof of insurance. 4 Q Okay. Thank you. So I -- 5 A I don't know where it -- when he said, "I 6 didn't do anything." It was either talking over me or 7 after I asked him for that. But that's -- that's when 8 it came out. I don't recall exactly at what point he 9 said, "I didn't do anything," but it was during the 10 initial confrontation. 11 Q So the "I didn't do anything" was either as 12 you asked for his identification and for his insurance 13 or it was after? 14 A It was at some point during the first part 15 of the contact. 16 Q Okay. And why did you ask for 17 identification and for insurance? 18 A For the ordinance violation for the window 19 tint. 20 Q Okay. And why insurance? 21 A Because you're supposed to maintain 22 insurance on vehicles in the State of Missouri. 23 Q I understand that, but you said that you 24 asked for his ID and his insurance for the ordinance 25 violation. So how does the insurance relate to the</p>

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1 What happened next?  
 2 A After?  
 3 Q After he said that he didn't have his  
 4 license and insurance on him.  
 5 A I don't recall. I'd have to refer to the  
 6 report.  
 7 Q Okay. And you said somewhere along here,  
 8 you also noticed a seat belt violation; right?  
 9 A Yes.  
 10 Q And describe for me, what is that violation?  
 11 A He didn't have his seat belt applied while  
 12 he was operating the vehicle.  
 13 Q Okay. And how were you able to determine  
 14 that?  
 15 A When he lowered the window.  
 16 Q When he lowered the window. You were able  
 17 to see into his car and see that his seat belt was not  
 18 on?  
 19 A Yes.  
 20 Q Okay. What time of day was this?  
 21 A 2000 hours. So about 8:00 o'clock.  
 22 Q 8:00 o'clock. And it was August?  
 23 A Yes.  
 24 Q Was it bright out?  
 25 A I don't recall.

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1 Q Okay. Kids were playing, though; right?  
 2 A I believe so, yes.  
 3 Q I mean, you testified that children were  
 4 playing on the -- on the jungle gym; right?  
 5 A There were people in the park -- throughout  
 6 the park, yes.  
 7 Q People were in the park. Were there kids on  
 8 the playground?  
 9 A I believe so.  
 10 Q I -- I think you testified that that was the  
 11 case; right? Do you remember there being children on  
 12 the playground?  
 13 A I believe so. Yes, there were kids.  
 14 Q So you do remember that?  
 15 A I believe so, yes.  
 16 Q Okay. So you said that after you asked  
 17 Mr. Watson for his identification, for his insurance,  
 18 he said that he didn't have his license on him, you  
 19 said -- and then he didn't have his insurance  
 20 available, you don't recall what happened next.  
 21 What's the next thing that you do recall?  
 22 A Calling for an assist unit.  
 23 Q Okay. Can you approximate how many minutes  
 24 into the interaction was that?  
 25 A I don't recall.

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1 Q Would you give me -- would you be able to  
 2 give me an approximation? Was it one minute? Was it  
 3 25 minutes?  
 4 MR. NORWOOD: Objection. Calls for  
 5 speculation.  
 6 A I don't recall.  
 7 Q (By Mr. Waldron) You have no memory?  
 8 A Yes, I do have a memory.  
 9 Q Okay. So do you have -- you have no way of  
 10 approximating, though, how many minutes it was into  
 11 the interaction that you called for an assist?  
 12 MS. ARRINDELL: Objection. Calls for  
 13 speculation and asked and answered.  
 14 A I don't recall.  
 15 Q (By Mr. Waldron) Okay. And do you remember  
 16 why you called for an assist?  
 17 A He was argumentative and combative.  
 18 Q And the argumentative, you testified that  
 19 his voice was loud; is that correct?  
 20 A Was not following commands.  
 21 Q Okay. And so we haven't got to the commands  
 22 yet. We'll come back to that. You said he was  
 23 combative. What was he doing that was combative?  
 24 A Not cooperating. Resisting. I believe I  
 25 asked him to step out of the vehicle before the assist

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1 arrived and I was trying to place him under arrest and  
 2 he refused.  
 3 Q You said he was resisting?  
 4 A Yes. After I asked him -- advised him he  
 5 was under arrest, to step out of the vehicle.  
 6 Q So before you called for assist, you  
 7 notified him that he was under arrest?  
 8 A Yes.  
 9 Q Okay. And -- and why was he under arrest?  
 10 A He didn't have his license, his insurance.  
 11 At that time, I believe I had went to the vehicle and  
 12 found out the name he gave was not a good name. It  
 13 was the wrong name.  
 14 Q Okay. So -- and all of this that you're  
 15 talking about right now, this is all before you called  
 16 for assist?  
 17 A Yes.  
 18 Q Okay. So I want to get into the stuff  
 19 before the assist then. Okay? So what do you  
 20 remember about before you called for an assist that we  
 21 haven't talked about?  
 22 A As far as what?  
 23 Q Well, you just mentioned a few things. I  
 24 think you mentioned that you ran his name or something  
 25 along those lines. Can you refresh -- tell me what

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1 you remember from that.

2 A That the name he gave didn't come back to  
3 anything. It did -- nothing popped up. There was no  
4 record of that person.

5 Q Okay. And so at what point did you ask him  
6 for his name?

7 A When he didn't have his license.

8 Q Okay. So -- okay. So this is helpful. He  
9 didn't have his license. He didn't have his  
10 identification. At some point in there, you asked him  
11 for his name; is that correct?

12 A His pedigree information.

13 Q His pedigree information. Would that have  
14 been the way you phrased the question?

15 A To him?

16 Q Yes.

17 A No.

18 Q No. How would you have phrased the  
19 question?

20 A "I need your name."

21 Q "I need your name." Okay. Would you have  
22 asked him for -- did you ask him for anything else?

23 A Yes.

24 Q What else?

25 A I don't recall.

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1 Q Driver's license would -- so driver's  
2 license would come --

3 A Driver's license number.

4 Q Driver's license number. Thank you. So you  
5 wouldn't ask for social security number until -- until  
6 after you can't find the person; is that right?

7 A Depends on the situation. Each thing is  
8 done on an individual basis.

9 Q Okay. But, in general, is that fair to say?

10 A Each situation is based off the individual  
11 situation.

12 Q So you may have asked him for the social  
13 security number. You don't remember since each time  
14 is different. Is that fair to say?

15 MS. ARRINDELL: Objection. Mischaracterizes  
16 his testimony.

17 A Can you rephrase the question?

18 Q (By Mr. Waldron) Yeah. I'm just trying  
19 to -- you said you -- you said you don't remember what  
20 exactly you asked him. You said that each situation  
21 is different. So it's possible that you asked him for  
22 his social security number early on?

23 A Early on?

24 Q Yeah.

25 A I don't recall.

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1 Q How do you know that you asked him for  
2 something else?

3 A I wouldn't have stopped at the name, I don't  
4 believe.

5 Q Okay. What else would you have asked?

6 A Anything to identify him; so . . .

7 Q Anything in particular?

8 A Date of birth.

9 Q Okay.

10 A Height, weight, address.

11 Q Do you remember whether you asked him any of  
12 these things?

13 A I do not recall. I would have to refer to  
14 my report.

15 Q Okay. Did you ask him for his social  
16 security number?

17 A At that point? No, I don't believe so.

18 Q You've said that the date of birth, the  
19 height and the weight, you said that those are things  
20 you would have asked. Generally, in situations like  
21 this, would the social security number be something  
22 that you would have asked about?

23 A Driver's license and social security will  
24 come if I can't obtain who they are through the  
25 initial search.

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1 Q Okay. But is it possible?

2 MS. ARRINDELL: Objection. Calls for  
3 speculation.

4 MR. NORWOOD: And let me object as vague in  
5 terms of "early on."

6 Q (By Mr. Waldron) Go ahead.

7 A Can you rephrase the question?

8 Q Is it possible that you asked Mr. Watson for  
9 his social security number during your stop?

10 A During the course of the stop?

11 Q Yes.

12 A That is possible.

13 Q Okay. And let's go to -- you asked him for  
14 a name. You asked him to give a name, you said. What  
15 name did he give?

16 A He gave Fred Watson.

17 Q He gave Fred Watson. And that was in  
18 response to your question, "I need your name"; is that  
19 correct?

20 A His pedigree information, yes.

21 Q No, I -- I'm just asking what question you  
22 asked. I believe you testified that you said "I need  
23 your name"; is that correct?

24 A Yes.

25 Q Okay. So he said "Fred Watson." What

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<p>1 happened after that?</p> <p>2 A I collected the information that he gave me</p> <p>3 and processed it.</p> <p>4 Q When you say "collected," would you have</p> <p>5 written it down?</p> <p>6 A Yes.</p> <p>7 Q In what?</p> <p>8 A Paper.</p> <p>9 Q Okay. What kind of paper?</p> <p>10 A Paper.</p> <p>11 Q I mean -- I mean, for example, I've got --</p> <p>12 I've got a legal pad here; right? They also have, you</p> <p>13 know, those sort of detective spiral pads that are</p> <p>14 smaller. What -- what were you writing on at this</p> <p>15 time?</p> <p>16 A A piece of paper.</p> <p>17 Q Just a piece of paper?</p> <p>18 A Yes.</p> <p>19 Q Okay. Was it common in your practice to</p> <p>20 have paper that -- that you used?</p> <p>21 A Yeah, we wrote on paper -- we write on paper</p> <p>22 all the time.</p> <p>23 Q Okay. Is it a certain type of paper?</p> <p>24 A Yes. Notebook paper.</p> <p>25 Q Notebook paper. Would it have been a part</p>	<p>1 A You have to rephrase the question.</p> <p>2 Q (By Mr. Waldron) Okay. This -- the practice</p> <p>3 of using a notebook is not something that's a Ferguson</p> <p>4 policy; correct?</p> <p>5 A A practice. Are you -- you have --</p> <p>6 Q Carrying -- carrying a notebook and -- like</p> <p>7 you did on that day. It's not a Ferguson policy;</p> <p>8 right?</p> <p>9 A To have a notebook?</p> <p>10 Q To carry a notebook when you're carrying out</p> <p>11 your duties.</p> <p>12 A You need a notebook when you're carrying out</p> <p>13 your duties.</p> <p>14 Q Okay. So most -- do most Ferguson officers</p> <p>15 do that?</p> <p>16 A I can't attest to what most officers do.</p> <p>17 Q Well, you've been an officer there for eight</p> <p>18 years; right?</p> <p>19 A Yes.</p> <p>20 Q You've interacted with probably dozens of</p> <p>21 officers; right?</p> <p>22 A Yes.</p> <p>23 Q Are you able to tell me, based on the</p> <p>24 interactions with double -- dozens of officers,</p> <p>25 whether or not -- do half of them carry a notebook?</p>
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<p>1 of a notebook or a piece of paper independently?</p> <p>2 A It was in a notebook.</p> <p>3 Q Okay. So you had a -- you had a notebook</p> <p>4 and -- and that's where you wrote the name that</p> <p>5 Mr. Watson gave you; is that correct?</p> <p>6 A Yes.</p> <p>7 Q Okay. Do you keep those notebooks?</p> <p>8 A No.</p> <p>9 Q What do you generally do with them once</p> <p>10 you're finished?</p> <p>11 A I lose track of them.</p> <p>12 Q You lose track of them. Okay. Is the --</p> <p>13 the keeping -- is the practice of keeping the</p> <p>14 notebook, is that a -- is that a policy or is that</p> <p>15 just something that you do within the Ferguson Police</p> <p>16 Department?</p> <p>17 MS. ARRINDELL: Objection. Mischaracterizes</p> <p>18 the witness' testimony.</p> <p>19 A Yeah, I can't tell you what they tell you to</p> <p>20 do on notebooks. I haven't seen a policy on that one.</p> <p>21 Q (By Mr. Waldron) Yeah. So you haven't seen</p> <p>22 a policy. So it's just something that you do</p> <p>23 independently as an officer. Is that fair to say?</p> <p>24 MS. ARRINDELL: Objection. Mischaracterizes</p> <p>25 the witness' testimony.</p>	<p>1 MR. NORWOOD: Objection. Asked and</p> <p>2 answered. Calls for speculation.</p> <p>3 A I can't tell you. I can't tell you what</p> <p>4 other officers do.</p> <p>5 Q (By Mr. Waldron) You don't know?</p> <p>6 A I cannot tell you what other officers do.</p> <p>7 Q And why can't you tell me what other</p> <p>8 officers do? You don't know or you're unable to tell</p> <p>9 me?</p> <p>10 A Because you'd have to ask the other officers</p> <p>11 what they do.</p> <p>12 Q You've never observed something like that?</p> <p>13 A I don't recall observing officers doing</p> <p>14 anything in particular as far as a notebook.</p> <p>15 Q Okay. So you write Mr. Watson's name down</p> <p>16 in your notebook. And what happens after that?</p> <p>17 MR. NORWOOD: Let me object.</p> <p>18 Mischaracterizes his testimony.</p> <p>19 Q (By Mr. Waldron) You write -- is it fair to</p> <p>20 say you wrote "Fred Watson" in your notebook?</p> <p>21 A On a sheet of paper.</p> <p>22 Q On the sheet of paper that was in your</p> <p>23 notebook. Okay. You wrote down "Fred Watson" on a</p> <p>24 sheet of paper; correct?</p> <p>25 A Some paper, yes.</p>

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<p>1 <b>Q Some paper. What happens then?</b></p> <p>2 A Processed the information and found out that</p> <p>3 it was not matching anything in the system.</p> <p>4 <b>Q Okay. And when you say, "processed the</b></p> <p>5 <b>information," what does that mean?</b></p> <p>6 A Ran it through the REJIS system.</p> <p>7 <b>Q Okay. And how would you have accessed the</b></p> <p>8 <b>REJIS system?</b></p> <p>9 A In the computer in the car or over the radio</p> <p>10 through dispatch.</p> <p>11 <b>Q Okay. So in the computer -- and do you</b></p> <p>12 <b>remember in the case of Mr. Watson whether you did it</b></p> <p>13 <b>over radio dispatch or through the -- through the car</b></p> <p>14 <b>computer?</b></p> <p>15 A I don't recall --</p> <p>16 <b>Q Okay.</b></p> <p>17 A -- at this time.</p> <p>18 <b>Q At this time. And what did you determine</b></p> <p>19 <b>once you ran it through the REJIS system?</b></p> <p>20 MR. NORWOOD: Objection. Asked and</p> <p>21 answered.</p> <p>22 A That Mr. Watson was not giving correct</p> <p>23 information to who he actually was.</p> <p>24 <b>Q (By Mr. Waldron) What happened next?</b></p> <p>25 A I'd have to refer to my report.</p>	<p>1 answer my question, yes or no, either way.</p> <p>2 MS. ARRINDELL: Does "I don't recall" answer</p> <p>3 the question sufficiently?</p> <p>4 MR. WALDRON: Absolutely.</p> <p>5 MS. ARRINDELL: Okay. He's answered that</p> <p>6 repeatedly.</p> <p>7 <b>Q (By Mr. Waldron) Okay. So you don't recall</b></p> <p>8 <b>anything between after you approached Mr. Watson,</b></p> <p>9 <b>after the REJIS search, and when the help comes, the</b></p> <p>10 <b>assist comes?</b></p> <p>11 A I'd have to refer to my report. I don't</p> <p>12 recall at this moment.</p> <p>13 <b>Q Okay. What's the next thing that you</b></p> <p>14 <b>remember?</b></p> <p>15 A Ultimately, Mr. Watson was arrested after my</p> <p>16 assist unit arrived.</p> <p>17 <b>Q And tell me about what you remember from</b></p> <p>18 <b>that.</b></p> <p>19 A Mr. Watson was arrested after the arrival of</p> <p>20 my assist unit.</p> <p>21 <b>Q How did that look?</b></p> <p>22 A He was placed in handcuffs.</p> <p>23 <b>Q Who was in your assist unit?</b></p> <p>24 A I'd have to refer to my report.</p> <p>25 <b>Q Nobody that you can recall today as you sit</b></p>
Page 66	Page 68
<p>1 <b>Q You don't remember?</b></p> <p>2 A I'd have to refer to my report.</p> <p>3 <b>Q To the best of your memory, what happened</b></p> <p>4 <b>next?</b></p> <p>5 A I believe I approached Mr. Watson again.</p> <p>6 <b>Q Okay. And what happened? You approached</b></p> <p>7 <b>him again after you determined through the REJIS</b></p> <p>8 <b>system that the name didn't show up. And what</b></p> <p>9 <b>happened?</b></p> <p>10 A Ultimately, Mr. Watson was arrested after</p> <p>11 the assist unit arrived.</p> <p>12 <b>Q Did anything happen between when you</b></p> <p>13 <b>approached him again and when the assist unit arrived?</b></p> <p>14 A I'd have to refer to my report.</p> <p>15 <b>Q Nothing that you remember?</b></p> <p>16 A I'd have to refer to my report.</p> <p>17 <b>Q I'm just -- I'm just -- I understand that --</b></p> <p>18 <b>I'm just trying to determine that there's nothing that</b></p> <p>19 <b>you can recall. Is that fair to say?</b></p> <p>20 MS. ARRINDELL: Objection. Asked and</p> <p>21 answered.</p> <p>22 MR. WALDRON: Respectfully, Geri Lynn, I --</p> <p>23 I -- I'm just trying to -- if the answer is, no, he</p> <p>24 doesn't remember, that's a perfectly acceptable</p> <p>25 answer. But "I'd have to refer to my report" doesn't</p>	<p>1 <b>here?</b></p> <p>2 A I'd have to refer to my report.</p> <p>3 <b>Q So you can't recall. Is that fair to say?</b></p> <p>4 A I can't recall right now. I'd have to refer</p> <p>5 to my report.</p> <p>6 <b>Q Okay. So Mr. Watson was placed into</b></p> <p>7 <b>handcuffs. Did you handcuff him?</b></p> <p>8 A I don't recall. I'd have to refer to my</p> <p>9 report.</p> <p>10 <b>Q I don't recall. Okay. What was he placed</b></p> <p>11 <b>under arrest for?</b></p> <p>12 A It would have been for the vision-reducing</p> <p>13 material and other non-traffic and traffic violations.</p> <p>14 <b>Q What were they?</b></p> <p>15 A I'd have to refer to my report. I don't</p> <p>16 recall.</p> <p>17 <b>Q Did you say "non-traffic and traffic-related</b></p> <p>18 <b>violations"?</b></p> <p>19 A Yes.</p> <p>20 <b>Q Okay. And -- and I believe at one point you</b></p> <p>21 <b>said that you recall ordering Mr. Watson to get out of</b></p> <p>22 <b>his vehicle. Do you recall that?</b></p> <p>23 A Yes.</p> <p>24 <b>Q Okay. And do you recall whether that was</b></p> <p>25 <b>before or after you requested assist?</b></p>

17 (Pages 65 to 68)

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<p style="text-align: right;">Page 69</p> <p>1 A That was before I requested an assist unit.</p> <p>2 <b>Q That was before you requested assist. Okay.</b></p> <p>3 <b>And what did you say?</b></p> <p>4 A I don't recall exactly what I said.</p> <p>5 <b>Q But you recall asking him to get out of his</b></p> <p>6 <b>vehicle?</b></p> <p>7 A He was under arrest and exit the vehicle.</p> <p>8 <b>Q Okay. And you advise -- did you advise</b></p> <p>9 <b>him -- did you tell him -- so did you tell him to get</b></p> <p>10 <b>out of his vehicle or did you tell him, "You're under</b></p> <p>11 <b>arrest. Get out of your vehicle"?</b></p> <p>12 A It would have been, "You're under arrest.</p> <p>13 Exit the vehicle."</p> <p>14 <b>Q Did you tell him why he was under arrest?</b></p> <p>15 A It would have been for the violations.</p> <p>16 <b>Q And what were the violations that you</b></p> <p>17 <b>observed at that time?</b></p> <p>18 A Window -- vision-reducing material and the</p> <p>19 other violations listed in the report.</p> <p>20 <b>Q The only one that you can recall at this</b></p> <p>21 <b>time was the tinted windows and windshield?</b></p> <p>22 A Seat belt.</p> <p>23 <b>Q So -- so he was under arrest for --</b></p> <p>24 A No operator's license in possession, I</p> <p>25 believe. Proof -- financial responsibility, no</p>	<p style="text-align: right;">Page 71</p> <p>1 <b>How many of those charges was he under</b></p> <p>2 <b>arrest for before you called your assist?</b></p> <p>3 A It would have been all of them.</p> <p>4 <b>Q All of them?</b></p> <p>5 A Yes.</p> <p>6 <b>Q All nine of them?</b></p> <p>7 A Yes.</p> <p>8 <b>Q Okay. Including failure to comply or</b></p> <p>9 <b>failure to obey?</b></p> <p>10 A Yes.</p> <p>11 <b>Q He was under arrest for that?</b></p> <p>12 A If it was listed in the report, yes.</p> <p>13 <b>Q And what had he done at that point?</b></p> <p>14 A He failed to comply with the order to exit</p> <p>15 the vehicle when he was placed under arrest.</p> <p>16 <b>Q Okay. Anything else that he had failed to</b></p> <p>17 <b>comply with at that point?</b></p> <p>18 A I'd have to refer to my report -- my report.</p> <p>19 <b>Q Nothing that you remember?</b></p> <p>20 A I'd have to refer to my report. I don't</p> <p>21 recall right now.</p> <p>22 <b>Q Okay. How about a false declaration? Was</b></p> <p>23 <b>he under arrest at that point for a false declaration?</b></p> <p>24 A Before the assist unit arrived?</p> <p>25 <b>Q Yes.</b></p>
<p style="text-align: right;">Page 70</p> <p>1 insurance.</p> <p>2 <b>Q Okay. So he was -- and -- and you recall</b></p> <p>3 <b>that this is why he was under arrest; because his</b></p> <p>4 <b>windows were tinted -- and I know you just said a</b></p> <p>5 <b>couple. Would you -- would you tell me? I was</b></p> <p>6 <b>writing. I apologize. His windows were tinted and</b></p> <p>7 <b>what else?</b></p> <p>8 A Financial responsibility, which is no proof</p> <p>9 of insurance.</p> <p>10 <b>Q Okay.</b></p> <p>11 A Seat belt. And no public operator's license</p> <p>12 in possession. And then a few other charges listed in</p> <p>13 the report.</p> <p>14 <b>Q Okay. And all of those were the reason why</b></p> <p>15 <b>you arrested him -- all the reasons in your report are</b></p> <p>16 <b>the reasons why you arrest -- arrested him before you</b></p> <p>17 <b>called your assist. Is that fair to say?</b></p> <p>18 A That I placed him under arrest?</p> <p>19 <b>Q Yes.</b></p> <p>20 A I'm not following the question.</p> <p>21 <b>Q So you charged Mr. Watson in total that day</b></p> <p>22 <b>with nine charges; correct?</b></p> <p>23 A If that's what the report says, yes.</p> <p>24 <b>Q Okay. I -- I -- I'll represent to you that</b></p> <p>25 <b>that's what -- that's what happened.</b></p>	<p style="text-align: right;">Page 72</p> <p>1 A If it's listed in the report.</p> <p>2 <b>Q Well, I'm asking to the best of your memory.</b></p> <p>3 A All charges listed in the report, he was</p> <p>4 under arrest before the assist unit arrived.</p> <p>5 <b>Q Okay. But independent of the report, to</b></p> <p>6 <b>your memory, do you recall if he was arrested for</b></p> <p>7 <b>that?</b></p> <p>8 A All charges listed in the report, he would</p> <p>9 have been under arrest for prior to the assist</p> <p>10 arriving.</p> <p>11 <b>Q I'm trying to get a sense of what you</b></p> <p>12 <b>remember now. And if you don't recall, that's</b></p> <p>13 <b>perfectly okay. But when you are only referring to</b></p> <p>14 <b>your report, it makes it difficult for me to know</b></p> <p>15 <b>whether you recall it at this time. Do you understand</b></p> <p>16 <b>what I'm saying?</b></p> <p>17 A Oh, yes. I thought that was rhetorical. Go</p> <p>18 ahead.</p> <p>19 <b>Q No, no, no. I -- I just -- I just want us</b></p> <p>20 <b>to sort of understand each other. So false</b></p> <p>21 <b>declaration, do you recall, as you sit here, whether</b></p> <p>22 <b>or not he was under arrest for it when you told him to</b></p> <p>23 <b>get out of his car?</b></p> <p>24 A All charges listed in the report, he was</p> <p>25 placed -- he was under arrest for prior to the assist</p>

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1       **Q** Or after he was booked.

2       A So after the vehicle was towed and after he

3       was booked?

4       **Q** Anything after his vehicle was towed.

5       A So you want me to answer if I remember

6       anything after he was booked or after the vehicle was

7       towed?

8       **Q** After the vehicle was towed.

9       A Okay. So don't answer the other question

10      about after he was booked?

11      **Q** Well --

12      MS. ARRINDELL: Anything that you recall

13      from either of those two instances is what he's --

14      what he's trying to ascertain. I don't know that --

15      A I don't understand the question.

16      **Q** (By Mr. Waldron) You testified that you

17      recall his vehicle being towed; correct?

18      A The vehicle was towed, yes.

19      **Q** And you testified that you recall that that

20      happened; correct?

21      A Testified that the vehicle was towed?

22      **Q** No, I'm asking if you testified that you

23      recall it, that you remember it happening.

24      A I testified that the vehicle was towed.

25      **Q** Right. What else do you remember from that

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1      night?

2      A That he was booked.

3      **Q** Okay. And what do you remember about that?

4      A That he was processed in the Ferguson jail.

5      **Q** Okay. And -- and describe for me what --

6      what about that do you remember? Do you remember

7      driving Mr. Watson there?

8      A I'd have to refer to my report. I don't

9      recall.

10     **Q** Do you recall seeing Mr. Watson in the jail?

11     A I'd have to refer to my report. I don't

12     recall.

13     **Q** Do you recall having any conversations with

14     Mr. Watson either in your vehicle or in another

15     Ferguson police vehicle?

16     A I'd have to refer to my report. I don't

17     recall.

18     **Q** Okay. Do you recall any other interaction

19     with Mr. Watson after he was arrested?

20     A What timeframe are you talking about?

21     **Q** Anything after he was arrested on

22     August 1st. Any interaction between you and him, do

23     you recall it?

24     A Interaction. You mean just me seeing him?

25     Him seeing me? You talking about a conversation?

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1       **Q** Thank you. A conversation.

2       A No, I don't recall.

3       **Q** Okay. Mr. Boyd, do you recall pulling a gun

4       out on Mr. Watson?

5       A No.

6       **Q** Okay. Is it something you would remember?

7       A Yes.

8       **Q** Yes. Okay. So -- okay. How many times did

9       you ask Mr. Watson to get out of the car?

10      A I'd have to refer to my report. I don't

11      recall.

12      **Q** Okay. Do you recall Mr. Watson at all using

13      a telephone?

14      A I'd have to refer to my report. I don't

15      recall.

16      **Q** Okay. Did Mr. Watson ever ask for your

17      name?

18      A I'd have to refer to my report. I don't

19      recall.

20      **Q** Okay. Did you ever look at the back of

21      Mr. Watson's car to see if -- if he had any license

22      plates in the back?

23      A During the course of the time that I was in

24      Mr. Watson's presence? When are you referring to?

25      **Q** At any point on August 1st.

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1       A I do not recall. I would have to refer to

2       my report.

3       **Q** So you don't recall looking to see whether

4       he had a license plate in the back?

5       A I do not recall. I'd have to refer to my

6       report.

7       **Q** Okay. Do you recall ever asking Mr. Watson

8       to take the keys out of his car?

9       A I don't recall. I'd have to refer to my

10      report.

11      **Q** If you would point a gun at somebody, would

12      that be something that you would have to report within

13      the -- as a policy of the Ferguson Police Department?

14      MS. ARRINDELL: Objection. What timeframe

15      are we talking?

16      MR. WALDRON: In general.

17      MS. ARRINDELL: Objection. Overbroad.

18      A Yeah. I wouldn't just point guns at people.

19      **Q** (By Mr. Waldron) I'm sorry?

20      A I wouldn't just point guns at people.

21      **Q** No, I understand that. What I'm saying is

22      that -- I'm asking you if -- if -- if a -- an officer

23      of the Ferguson Police Department points a gun at

24      somebody, is there any procedure that would take place

25      that the officer would have to tell a supervisor or

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<p>1 A It doesn't have a DSN number.</p> <p>2 <b>Q Okay.</b></p> <p>3 A Or a call sign.</p> <p>4 <b>Q And what's the following entry?</b></p> <p>5 A After "Notes added. Notes added. Field 5"</p> <p>6 <b>Q Yes.</b></p> <p>7 A At 20:18, 16 seconds?</p> <p>8 <b>Q Yes.</b></p> <p>9 A "Frank 34 486. Arrived. Arrived on scene."</p> <p>10 <b>Q And what do you understand that to mean?</b></p> <p>11 A Frank 34, arrived.</p> <p>12 <b>Q Okay. And do you know who 486 is?</b></p> <p>13 A I don't recall off the top of my head.</p> <p>14 <b>Q Do you know who 296 is?</b></p> <p>15 A I don't recall off the top of my head.</p> <p>16 <b>Q Do you agree that this makes it appear as</b></p> <p>17 <b>though by 20:18:16, three officers are on the scene?</b></p> <p>18 A I'm not understanding the question.</p> <p>19 <b>Q We've seen 590 arrived on scene; right?</b></p> <p>20 A Yes.</p> <p>21 <b>Q We've seen 296 arrived on scene?</b></p> <p>22 A Yes.</p> <p>23 <b>Q And we see 486 arrived on scene?</b></p> <p>24 A Yes.</p> <p>25 <b>Q Do you agree that that indicates that as of</b></p>	<p>1 <b>Q What does that -- I don't understand what</b></p> <p>2 <b>"10 Codes" means.</b></p> <p>3 A Law enforcement codes.</p> <p>4 <b>Q So 10 Codes are law enforcement codes?</b></p> <p>5 A Yes.</p> <p>6 <b>Q And 1050 -- does 1051 indicate tow trucks?</b></p> <p>7 A Yes.</p> <p>8 <b>Q Okay. And what does the next line say?</b></p> <p>9 A At 20:25:07?</p> <p>10 <b>Q Yes.</b></p> <p>11 A "Notes added. Notes added. Down the main</p> <p>12 path to the rear parking lot."</p> <p>13 <b>Q Do you know who would've added those notes?</b></p> <p>14 A No.</p> <p>15 <b>Q Okay. And what's the next line?</b></p> <p>16 A At 20:25:11?</p> <p>17 <b>Q Yes.</b></p> <p>18 A ASGN, space, CN, number sign, Complaint</p> <p>19 Number 12-14370 assigned.</p> <p>20 <b>Q How does somebody initiate -- how does an</b></p> <p>21 <b>officer initiate a complaint?</b></p> <p>22 A I don't understand the question.</p> <p>23 <b>Q In the process of policing, if you decide</b></p> <p>24 <b>that you're going to file a complaint on somebody you</b></p> <p>25 <b>would initiate a complaint; correct?</b></p>
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<p>1 <b>20:18, there were three different officers on the</b></p> <p>2 <b>scene?</b></p> <p>3 A Yes, it does show that three officers</p> <p>4 arrived.</p> <p>5 <b>Q Okay. And what's the next line say?</b></p> <p>6 A I lost track. Which one we on?</p> <p>7 <b>Q We're at 20:24:47.</b></p> <p>8 A Okay. Do you want me to read that?</p> <p>9 <b>Q Yes, please.</b></p> <p>10 A Okay. "Notes added. Notes added. 1051</p> <p>11 responding."</p> <p>12 <b>Q And what does "1051 responding" mean?</b></p> <p>13 A Tow truck.</p> <p>14 <b>Q Tow truck. Tow truck is 1051?</b></p> <p>15 A 10 Codes, yes.</p> <p>16 <b>Q I'm sorry. I didn't hear what you said.</b></p> <p>17 A 10 Codes, yes.</p> <p>18 <b>Q 10 Codes?</b></p> <p>19 A Uh-huh.</p> <p>20 <b>Q What does "10 Codes" mean?</b></p> <p>21 A Law enforcement codes?</p> <p>22 <b>Q Yeah. What does that mean?</b></p> <p>23 A Law enforcement codes?</p> <p>24 <b>Q Uh-huh.</b></p> <p>25 A 10 Codes.</p>	<p>1 A Complaint?</p> <p>2 <b>Q Yeah, a complaint. That's the word that's</b></p> <p>3 <b>used here. Do you use that word in policing?</b></p> <p>4 A That's a complaint number.</p> <p>5 <b>Q Complaint number. Right. So the complaint</b></p> <p>6 <b>number refers to a complaint; is that correct?</b></p> <p>7 A It refers -- it's assigned for an incident.</p> <p>8 <b>Q Okay. It's assigned for an incident. So</b></p> <p>9 <b>this complaint number 12-14370, that represents an</b></p> <p>10 <b>incident. Am I using the term correctly?</b></p> <p>11 A It's assigned to an incident.</p> <p>12 <b>Q Okay. And who would open up that incident?</b></p> <p>13 A Assuming if it's for -- I -- I can't access</p> <p>14 it, the dispatchers would be the ones to assign a</p> <p>15 complaint on this.</p> <p>16 <b>Q Okay. All right. I think we might be done</b></p> <p>17 <b>with this for right now.</b></p> <p>18 (Exhibit 3, REJIS Printout, was marked</p> <p>19 for identification.)</p> <p>20 <b>Q (By Mr. Waldron) I'm next going to hand you</b></p> <p>21 <b>Plaintiff's Exhibit 3. And I'm going to ask you to</b></p> <p>22 <b>skip the first two pages that are FERG-WAT 267 and</b></p> <p>23 <b>268, and I'm going to ask you to move to FERG-WAT 279.</b></p> <p>24 <b>Do you see that page in the lower right-hand corner?</b></p> <p>25 A Yes.</p>

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<p>1 my -- your vehicle license.</p> <p>2 <b>Q Okay. What about my VIN number?</b></p> <p>3 A If you gave me your VIN number?</p> <p>4 <b>Q Yes.</b></p> <p>5 A If it's registered?</p> <p>6 <b>Q Yes.</b></p> <p>7 A Yes, if it's in Missouri.</p> <p>8 <b>Q Okay. Only if it's in Missouri?</b></p> <p>9 A I believe they have other ways to find</p> <p>10 out-of-state stuff, but I'm not familiar with those.</p> <p>11 <b>Q Okay. Having looked at the top of this</b></p> <p>12 <b>document, does this look like a search that you would</b></p> <p>13 <b>have -- that you ran? Does this refresh your memory</b></p> <p>14 <b>at all about running a search on Mr. Watson?</b></p> <p>15 A No.</p> <p>16 <b>Q Okay. Can we go -- you see halfway through</b></p> <p>17 <b>the page where there's a line break, we're about a</b></p> <p>18 <b>third of the way through the page, there's a --</b></p> <p>19 <b>there's a black line? I'm asking -- I'm going to ask</b></p> <p>20 <b>you now about everything underneath that.</b></p> <p>21 <b>Do you see where it says "Start of DOR</b></p> <p>22 <b>response"?</b></p> <p>23 A Yes.</p> <p>24 <b>Q What is -- what does that mean?</b></p> <p>25 A Start of DOR response.</p>	<p>1 A Department of Revenue information.</p> <p>2 <b>Q Okay. Such as what?</b></p> <p>3 A Department of Revenue information.</p> <p>4 <b>Q What are types of Department of Revenue</b></p> <p>5 <b>information?</b></p> <p>6 A Driver's licenses, vehicle information, boat</p> <p>7 registration.</p> <p>8 <b>Q Anything else?</b></p> <p>9 A It's plenty of other things.</p> <p>10 <b>Q What else?</b></p> <p>11 A I don't know.</p> <p>12 <b>Q So you said "driver's license." And that --</b></p> <p>13 <b>would that be driver's license plates? Would that be</b></p> <p>14 <b>driver's -- driver's license numbers like on my ID or</b></p> <p>15 <b>my license plates of my car?</b></p> <p>16 A Vehicle plates, driver's license numbers.</p> <p>17 <b>Q Okay. And let's move about halfway down.</b></p> <p>18 <b>You see underneath -- you see surrounded by stars, it</b></p> <p>19 <b>says, "This record restricted under the Federal</b></p> <p>20 <b>Driver's Privacy Protection Act"? Do you see that?</b></p> <p>21 A Yes.</p> <p>22 <b>Q And what's the license that's given</b></p> <p>23 <b>underneath that?</b></p> <p>24 A The license?</p> <p>25 <b>Q Yes.</b></p>
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<p>1 <b>Q What's a DOR response?</b></p> <p>2 A Department of Revenue.</p> <p>3 <b>Q Yeah. What's a DOR response?</b></p> <p>4 A A Department of Revenue response.</p> <p>5 <b>Q Yes.</b></p> <p>6 A That's what it is.</p> <p>7 <b>Q Explain to me what is a Department of</b></p> <p>8 <b>Revenue response.</b></p> <p>9 A It's a Department of Revenue response.</p> <p>10 <b>Q It's -- there's -- there's -- and in the --</b></p> <p>11 <b>have you seen such responses before?</b></p> <p>12 A Department of Revenue responses?</p> <p>13 <b>Q Yes.</b></p> <p>14 A Yes.</p> <p>15 <b>Q Yes. So I'm asking you to explain to me</b></p> <p>16 <b>what is a Department of Revenue response.</b></p> <p>17 A It is a Department of Revenue response.</p> <p>18 <b>Q And can you explain it any further to me,</b></p> <p>19 <b>what such a response is? How somebody -- what</b></p> <p>20 <b>information you learn from the Department of Revenue</b></p> <p>21 <b>response?</b></p> <p>22 A What information am I entering?</p> <p>23 <b>Q Well, what -- first, let's say, what</b></p> <p>24 <b>information in a Department of Revenue response are</b></p> <p>25 <b>you -- do you have access to?</b></p>	<p>1 A G208010016.</p> <p>2 <b>Q And what's the name?</b></p> <p>3 A The name is Watson, space, Freddie, space,</p> <p>4 D.</p> <p>5 <b>Q And what date was this response run?</b></p> <p>6 A It looks like 8/1.</p> <p>7 <b>Q And what time was it run?</b></p> <p>8 A They got 21:05 and 9:04.</p> <p>9 <b>Q So that's within an hour or two of when you</b></p> <p>10 <b>encountered Mr. Watson; is that correct?</b></p> <p>11 A I believe so. I believe I encountered him</p> <p>12 at 20:17.</p> <p>13 <b>Q Okay. And what's the resident address?</b></p> <p>14 A Resident address is 115 Monteith, St. Louis,</p> <p>15 Missouri, 63137.</p> <p>16 <b>Q And what's the current address?</b></p> <p>17 A PO Box 2003, Fairview Heights, Illinois,</p> <p>18 62208.</p> <p>19 <b>Q As we've gone over the details of this, have</b></p> <p>20 <b>any -- have any of the details come back to you about</b></p> <p>21 <b>seeing this document before?</b></p> <p>22 A No.</p> <p>23 <b>Q Okay. And what is the status of the</b></p> <p>24 <b>Missouri license?</b></p> <p>25 A "Status: MO, valid, expired."</p>

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<p>1 Q What do you understand that to mean?</p> <p>2 A The license is expired.</p> <p>3 Q Okay. And is that somebody's license plates</p> <p>4 or their driver's license?</p> <p>5 A This is a driver's license inquiry.</p> <p>6 Q Driver's license. If I had an Illinois</p> <p>7 driver's license, would it show up on here?</p> <p>8 A On this response?</p> <p>9 Q Yes.</p> <p>10 A For the Department of Revenue?</p> <p>11 Q Yes.</p> <p>12 A This is Missouri.</p> <p>13 Q So if I had an Illinois license -- driver's</p> <p>14 license, would it show up on here?</p> <p>15 A Not in Missouri's Department of Revenue</p> <p>16 system.</p> <p>17 Q Okay. I'm going to ask you to turn to the</p> <p>18 next page, please. What is this -- this next entry</p> <p>19 says, "Start of REJIS hot file response." What's a</p> <p>20 REJIS hot file?</p> <p>21 A You'd have to ask REJIS.</p> <p>22 Q Do you know what it is?</p> <p>23 A I don't know what the "hot file" stands for,</p> <p>24 no.</p> <p>25 Q Do you know what it searches?</p>	<p>1 Q What's MULES?</p> <p>2 A That's a Missouri Uniform Law Enforcement</p> <p>3 sharing system.</p> <p>4 Q And what information is stored in MULES?</p> <p>5 A Missouri Uniform Law Enforcement stuff. I</p> <p>6 don't know.</p> <p>7 Q What sort of stuff is that?</p> <p>8 A Missouri law enforcement stuff.</p> <p>9 Q And do you know any -- anything that's</p> <p>10 stored in there?</p> <p>11 A There's a multitude of things. I don't</p> <p>12 recall offhand what it is.</p> <p>13 Q You don't know anything?</p> <p>14 A There are a multitude of things stored in</p> <p>15 there. I don't recall right now what they are.</p> <p>16 Q Okay. Can we go halfway down after the</p> <p>17 solid black line? Do you see where it says, "Start of</p> <p>18 Nlets vehicle registration"?</p> <p>19 A Yes.</p> <p>20 Q What is the Nlets vehicle registration?</p> <p>21 A Nlets vehicle registration?</p> <p>22 Q Yes. What is that? If you know.</p> <p>23 A Nlets vehicle registration.</p> <p>24 Q And what is Nlets vehicle registration?</p> <p>25 A Nlets vehicle registration.</p>
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<p>1 A Sure. A lot of things.</p> <p>2 Q What?</p> <p>3 A I don't know, but I'm sure a lot of things.</p> <p>4 Q Oh. But you don't know what it searches?</p> <p>5 A That -- I don't know of everything exactly</p> <p>6 right now, no.</p> <p>7 Q When you run somebody's name in REJIS, or</p> <p>8 when you want to find out about a person, is there --</p> <p>9 are there different types of searches that you can</p> <p>10 run?</p> <p>11 A In REJIS?</p> <p>12 Q Yes.</p> <p>13 A I don't recall. We haven't had REJIS in a</p> <p>14 while.</p> <p>15 Q So you don't remember whether there are</p> <p>16 different types?</p> <p>17 A Yes.</p> <p>18 Q Okay. The next -- after the line, the next</p> <p>19 one seems to say, "Start of MULES hot file response."</p> <p>20 Do you see where I am?</p> <p>21 A Yes.</p> <p>22 Q Do you know what MULES hot file response is?</p> <p>23 A MULES hot file response?</p> <p>24 Q Yes.</p> <p>25 A MULES. Not MULES hot file response.</p>	<p>1 Q Have you ever had any -- what information</p> <p>2 can you get from Nlets vehicle registration?</p> <p>3 A Right here it's showing stuff from</p> <p>4 Mr. Watson's vehicle.</p> <p>5 Q And what information do you see?</p> <p>6 MS. ARRINDELL: Can we maybe spell Nlets?</p> <p>7 MR. WALDRON: Yeah. So Nlets is N-I-e-t-s.</p> <p>8 Thank you.</p> <p>9 Q (By Mr. Waldron) So what information do you</p> <p>10 see here?</p> <p>11 A Let's see. RR.FLO37065 Victor --</p> <p>12 Q And what does that mean?</p> <p>13 A That's Florida, I guess.</p> <p>14 Q Florida what?</p> <p>15 A I don't know.</p> <p>16 MS. ARRINDELL: One second. You got to --</p> <p>17 you got to move your hand.</p> <p>18 THE WITNESS: Oh, I'm sorry.</p> <p>19 MS. ARRINDELL: She's having a hard time</p> <p>20 hearing you and she's got to lean forward.</p> <p>21 THE WITNESS: Ah, okay. Okay.</p> <p>22 A What is Florida?</p> <p>23 Q (By Mr. Waldron) No.</p> <p>24 A Okay.</p> <p>25 Q What is FL037065V?</p>

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<p>1 A I don't know.</p> <p>2 <b>Q Okay. And what's the date on this search?</b></p> <p>3 A 19- -- I don't know if that's the date, but</p> <p>4 there's a date and time listed. I don't know if it's</p> <p>5 in reference to the search.</p> <p>6 <b>Q And what's the -- what's the date and time</b></p> <p>7 <b>listed?</b></p> <p>8 A Date and time listed is 19:46, 8/1/2012.</p> <p>9 <b>Q Okay.</b></p> <p>10 A 34118.</p> <p>11 <b>Q Do you know what "34118" means?</b></p> <p>12 A I do not.</p> <p>13 <b>Q Then the next line says "22869." Do you</b></p> <p>14 <b>know what that means?</b></p> <p>15 A I do not.</p> <p>16 <b>Q Would you tell me what the next thing is</b></p> <p>17 <b>that you can understand on this.</b></p> <p>18 A Looks like a plate and a VIN, vehicle</p> <p>19 description.</p> <p>20 <b>Q And where do you see that?</b></p> <p>21 A Under DHSMV record.</p> <p>22 <b>Q And what's the plate?</b></p> <p>23 A 958 Mary Robert John.</p> <p>24 <b>Q And then that series of numbers followed by</b></p> <p>25 <b>Buick, is that -- is that the vehicle?</b></p>	<p>1 and the abbreviation for Buick, Boston, Union, Ida,</p> <p>2 Charles. And it says 4 -- "4D," which I'm assuming is</p> <p>3 four-door.</p> <p>4 <b>Q And what else -- what other information can</b></p> <p>5 <b>you determine?</b></p> <p>6 A The color was black, abbreviated "B-I-k."</p> <p>7 <b>Q Who's the driver? Or who's -- who's the car</b></p> <p>8 <b>registered to, I should say?</b></p> <p>9 A It doesn't say who it's registered to, but</p> <p>10 there is a name listed with it.</p> <p>11 <b>Q Do you understand what -- how that might be</b></p> <p>12 <b>connected?</b></p> <p>13 A Because it's on the same sheet.</p> <p>14 <b>Q And do you know what that name would</b></p> <p>15 <b>represent?</b></p> <p>16 A More than likely, the person who owns it or</p> <p>17 bought it or registered it.</p> <p>18 <b>Q Okay. And do you know when the plate is</b></p> <p>19 <b>registered until?</b></p> <p>20 A I don't see it off the top.</p> <p>21 <b>Q Okay. And let's look -- if I can ask you to</b></p> <p>22 <b>turn the page, Mr. Boyd. Let's just look at the next</b></p> <p>23 <b>page. Do you see where it says "Insurance</b></p> <p>24 <b>Information"?</b></p> <p>25 A Yes.</p>
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<p>1 A Followed by Buick?</p> <p>2 <b>Q Or B-u-i-c.</b></p> <p>3 A You -- I'm confused. What's the question?</p> <p>4 <b>Q Is that -- do you understand that to be the</b></p> <p>5 <b>vehicle?</b></p> <p>6 A After Buick?</p> <p>7 <b>Q Well, the -- the vehicle that's being</b></p> <p>8 <b>searched here.</b></p> <p>9 A When did we start searching vehicles?</p> <p>10 <b>Q Well, it appears as though this is</b></p> <p>11 <b>responsive -- this shows the license plate; correct?</b></p> <p>12 A There's a license plate, I believe, yes.</p> <p>13 <b>Q Okay. And it also says -- do you see on the</b></p> <p>14 <b>right, it says "Color: Black"?</b></p> <p>15 A On the second line below there, yes, there</p> <p>16 is a -- "Color: Black," yes.</p> <p>17 <b>Q Do you see the letters above B-u-i-c?</b></p> <p>18 A Yes.</p> <p>19 <b>Q Does that refer -- does that seem to you to</b></p> <p>20 <b>refer to a car, having used this program before?</b></p> <p>21 A Yes. This is describing information from a</p> <p>22 vehicle.</p> <p>23 <b>Q And what information can you discern from</b></p> <p>24 <b>this?</b></p> <p>25 A That it has VIN number of 1G4GE5EDXB4279655</p>	<p>1 <b>Q And the insurance appears to be Government</b></p> <p>2 <b>Employee Insurance Company; is that correct?</b></p> <p>3 A The insurer and then it has Government</p> <p>4 Employee INS. CO., yes.</p> <p>5 <b>Q And there's a policy number 4038680916; is</b></p> <p>6 <b>that correct?</b></p> <p>7 A 4038680916 next to policy number, yes.</p> <p>8 <b>Q Great. All right. That's all I have for</b></p> <p>9 <b>that one.</b></p> <p>10 MR. WALDRON: Can we take a quick break? I</p> <p>11 don't think I'll be more than about five minutes.</p> <p>12 MS. ARRINDELL: Sure. Go ahead.</p> <p>13 MR. WALDRON: Thanks.</p> <p>14 (Whereupon, a brief break was taken.)</p> <p>15 MR. WALDRON: We're back on the record.</p> <p>16 <b>Q (By Mr. Waldron) Officer Boyd, I'm going to</b></p> <p>17 <b>pass to you what's being marked as Exhibit 4.</b></p> <p>18 <b>(Exhibit 4, Uniform Citations, were</b></p> <p>19 <b>marked for identification.)</b></p> <p>20 MS. ARRINDELL: Thank you.</p> <p>21 <b>Q (By Mr. Waldron) Do you recognize -- I'm --</b></p> <p>22 <b>I'm just going to ask you right now to look at the</b></p> <p>23 <b>first page that's labeled "WATSON_0001." Do you see</b></p> <p>24 <b>where I am?</b></p> <p>25 A Yes.</p>

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<p>1 Q Okay. Do you recognize this document?</p> <p>2 A They look like copies.</p> <p>3 Q They look like what?</p> <p>4 A Copies.</p> <p>5 Q Copies. Copies of what?</p> <p>6 A Uniform citations.</p> <p>7 Q And is this a -- is this the sort of</p> <p>8 citation that you would write at the City of Ferguson?</p> <p>9 A For violations, traffic?</p> <p>10 Q Yes. For traffic violations?</p> <p>11 A Yes.</p> <p>12 Q And was it -- is the yellow the only paper</p> <p>13 or are there -- was it in duplicate or triplicate?</p> <p>14 A There are four --</p> <p>15 Q There are four?</p> <p>16 A -- copies.</p> <p>17 Q And what are the four colors?</p> <p>18 A Two are white, one is yellow, one is red.</p> <p>19 Q And does the yellow go to the violator as it</p> <p>20 says at the bottom?</p> <p>21 A I believe the yellow is the violator's copy.</p> <p>22 Q Okay. And in the sequence of writing the</p> <p>23 tickets, they're stacked on top of each other. Which</p> <p>24 one is your pen actually hitting?</p> <p>25 A The white's.</p>	<p>1 know?</p> <p>2 A Probably the computer.</p> <p>3 Q The computer. Which computer program would</p> <p>4 have given that to you?</p> <p>5 A I don't recall, but we were using REJIS.</p> <p>6 Q Okay. Were there any other programs that</p> <p>7 you used at this time?</p> <p>8 A No. I don't recall any.</p> <p>9 Q And do you know what the ordinance number it</p> <p>10 is that was violated here?</p> <p>11 A Not off the top of my head.</p> <p>12 Q What sort of -- when you got to the City of</p> <p>13 Ferguson, what sort of training did you receive on the</p> <p>14 city ordinances?</p> <p>15 A I don't recall.</p> <p>16 Q Do you recall having any training?</p> <p>17 A Yes.</p> <p>18 Q And what -- what do you recall?</p> <p>19 A That I had training.</p> <p>20 Q And what do you recall about that training?</p> <p>21 A It was nine weeks -- nine to 12 weeks.</p> <p>22 Q And was it -- in the process of that</p> <p>23 training, did you learn about the specific ordinances</p> <p>24 of the City?</p> <p>25 A Specific ordinances?</p>
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<p>1 Q The white is on top?</p> <p>2 A Yeah. The white's on top.</p> <p>3 Q Okay. What is this ticket for?</p> <p>4 A You would like to know the charge listed on</p> <p>5 the ticket?</p> <p>6 Q Yes.</p> <p>7 A No operator's license in possession.</p> <p>8 Q And is that your signature at the bottom?</p> <p>9 A Yes.</p> <p>10 Q And what ordinance is violated here?</p> <p>11 A No operator's license in possession.</p> <p>12 Q Do you see two lines underneath that, it</p> <p>13 says, "In violation of," and it's blank, but there's a</p> <p>14 check through ordinance. Do you see where I am?</p> <p>15 A Yes.</p> <p>16 Q Is it correct to say you did not write an</p> <p>17 ordinance in there?</p> <p>18 A I don't recall.</p> <p>19 Q Just from looking at it, does it appear as</p> <p>20 though you wrote an ordinance in there?</p> <p>21 A I don't recall.</p> <p>22 Q Do you see where the driver's license number</p> <p>23 is identified on this document?</p> <p>24 A Yes.</p> <p>25 Q Where'd you get that information, do you</p>	<p>1 Q Yes.</p> <p>2 A I don't recall.</p> <p>3 Q Do you recall learning about any ordinances</p> <p>4 in the nine-to-12-week training?</p> <p>5 A I don't recall the ordinances I learned.</p> <p>6 Q Can you explain to me why you had probable</p> <p>7 cause to write this ticket?</p> <p>8 MR. NORWOOD: Let me object. Calls for a</p> <p>9 legal conclusion.</p> <p>10 Subject to that.</p> <p>11 Q (By Mr. Waldron) Go ahead.</p> <p>12 A I'm sorry. Why did I have probable cause to</p> <p>13 write the ticket?</p> <p>14 Q Yes.</p> <p>15 A I don't understand the question.</p> <p>16 Q So you wrote this ticket; correct?</p> <p>17 A Yes.</p> <p>18 Q And you wrote this ticket because you</p> <p>19 believed a violation had taken place; correct?</p> <p>20 A Yes.</p> <p>21 Q Do you recall what gave you cause to believe</p> <p>22 that a violation had taken place?</p> <p>23 A Which violation?</p> <p>24 Q This violation.</p> <p>25 MS. ARRINDELL: That one.</p>

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<p style="text-align: right;">Page 161</p> <p>1 stop?</p> <p>2 A Are you still operating the vehicle?</p> <p>3 Q Well, I'm ask -- the car's still running,</p> <p>4 yes.</p> <p>5 A So you're still operating the vehicle?</p> <p>6 Q That's correct.</p> <p>7 A Then you're in violation.</p> <p>8 Q Okay. Let's look at the next page that's</p> <p>9 labeled "Watson 0007."</p> <p>10 And what's this citation for? And at the</p> <p>11 top, it's 787147.</p> <p>12 A 787147 says "Failure to register." And then</p> <p>13 there's something, I can't quite see it, "Out-of-state</p> <p>14 motor vehicle, within 30 days," looks like. I don't</p> <p>15 know what that is. I couldn't even make it out.</p> <p>16 Q Could it -- could it be of -- could it be of</p> <p>17 residence?</p> <p>18 A Yeah. Yeah, it could be that.</p> <p>19 Q Could you explain, besides the title of the</p> <p>20 ordinance, what does this ordinance mean?</p> <p>21 A I'm sorry?</p> <p>22 Q Besides the title of the ordinance -- the</p> <p>23 ordinance that you read to me, when are times that you</p> <p>24 would enforce this ordinance?</p> <p>25 A Somebody fails to register their vehicle</p>	<p style="text-align: right;">Page 163</p> <p>1 Q Yes. Okay. And where does that 30-day</p> <p>2 number come from?</p> <p>3 A At the time they established residency in</p> <p>4 Missouri?</p> <p>5 Q Yeah. Where -- is that in the ordinance?</p> <p>6 A I'd have to refer to the ordinance. I don't</p> <p>7 recall right now.</p> <p>8 Q If it wouldn't be in the ordinance, then</p> <p>9 where would it be?</p> <p>10 A I'm assuming it would be in the ordinance.</p> <p>11 So I don't know.</p> <p>12 Q Okay. And why did you have probable cause</p> <p>13 to write this ticket?</p> <p>14 A Because he failed to register his vehicle in</p> <p>15 the State of Missouri -- or with the State of Missouri</p> <p>16 within 30 days of residence.</p> <p>17 Q So that means you believe that Mr. Watson</p> <p>18 had been a residence of Missouri -- a resident of</p> <p>19 Missouri for 30 days or more; is that correct?</p> <p>20 A Yes.</p> <p>21 Q And why did you believe that?</p> <p>22 A He had an expired license, and there was</p> <p>23 nothing else to show that he was not a resident of</p> <p>24 Missouri.</p> <p>25 Q What about any searches that you ran?</p>
<p style="text-align: right;">Page 162</p> <p>1 after -- after -- within 30 days of their -- of</p> <p>2 residence.</p> <p>3 Q And they have to -- do they have to live in</p> <p>4 the State of Missouri?</p> <p>5 A You have to be a resident, yes.</p> <p>6 Q So you have to be a resident of Missouri in</p> <p>7 order to --</p> <p>8 A You don't have to. I mean, I -- who would</p> <p>9 register their vehicle if they weren't a resident?</p> <p>10 Q I'm saying if I'm -- what if I'm passing</p> <p>11 through Missouri, am I in violation of this?</p> <p>12 A When you're a resident?</p> <p>13 Q No.</p> <p>14 A How long are you passing through?</p> <p>15 Q I'm -- I'm driving -- literally driving</p> <p>16 through.</p> <p>17 A So you are asking me if you have to register</p> <p>18 your vehicle to drive it into Missouri?</p> <p>19 Q I don't. I don't; right? I mean, we agree,</p> <p>20 I wouldn't have to do that; right?</p> <p>21 A I don't understand that question.</p> <p>22 Q Is it fair to say that only people who can</p> <p>23 get this citation are people who have lived in</p> <p>24 Missouri for more than 30 days?</p> <p>25 A Yes.</p>	<p style="text-align: right;">Page 164</p> <p>1 A I'm confused. Searches?</p> <p>2 Q Did you run any searches that show he might</p> <p>3 be a resident of a different state?</p> <p>4 A I don't believe -- I don't know how we would</p> <p>5 run a search on a different state to see where he</p> <p>6 lived that's --</p> <p>7 Q How about his drive -- his driver's</p> <p>8 license -- or, I'm sorry -- his license plate? What</p> <p>9 was his -- what state was his license plate from?</p> <p>10 A I believe what you showed me was Florida.</p> <p>11 Q Okay. So yet, despite that, you still</p> <p>12 believed that he was a Missouri resident?</p> <p>13 A Yes.</p> <p>14 Q Okay. And the next and last page is 0008,</p> <p>15 and that's ticket number 787148. Mr. Boyd, what is --</p> <p>16 what is this ticket for?</p> <p>17 A 787148 shows no vehicle inspection.</p> <p>18 Q And when -- when are you authorized to write</p> <p>19 a citation like that?</p> <p>20 A When you don't have a vehicle inspection.</p> <p>21 Q Every car that doesn't have a vehicle</p> <p>22 inspection is in violation?</p> <p>23 A If they're Missouri residents.</p> <p>24 Q Okay. So you -- so for this ordinance, you</p> <p>25 have to be a Missouri resident?</p>

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<p style="text-align: right;">Page 169</p> <p>1       <b>Q</b> Have you received any training since you've</p> <p>2       <b>been at the City of Ferguson?</b></p> <p>3       A I don't recall.</p> <p>4       <b>Q</b> Okay. So if you have, you don't remember</p> <p>5       <b>what -- you don't remember -- you don't remember</b></p> <p>6       <b>receiving that training?</b></p> <p>7       A I received continuing education training,</p> <p>8       but I don't know all of the topics for all of them.</p> <p>9       <b>Q</b> Based on your training, when's a person</p> <p>10       <b>allowed to -- when's an officer allowed to search a</b></p> <p>11       <b>person's vehicle?</b></p> <p>12       MS. ARRINDELL: Objection. Calls for a</p> <p>13       legal conclusion.</p> <p>14       You can answer to the extent you know the</p> <p>15       answer.</p> <p>16       A Incident to arrest, consent, probable cause.</p> <p>17       <b>Q</b> (By Mr. Waldron) Any others?</p> <p>18       A None that I can think of now.</p> <p>19       <b>Q</b> Okay. And what does the search incident to</p> <p>20       <b>arrest look like?</b></p> <p>21       A Somebody's arrested. You search the</p> <p>22       vehicle.</p> <p>23       <b>Q</b> And what are you searching for in that</p> <p>24       <b>instance?</b></p> <p>25       A Illegal items. If you're doing an inventory</p>	<p style="text-align: right;">Page 171</p> <p>1       <b>Q</b> (By Mr. Waldron) So if you arrest somebody</p> <p>2       <b>and they're in a vehicle, you can search their car?</b></p> <p>3       A If they're in it.</p> <p>4       <b>Q</b> If they're in it. Okay. And are you</p> <p>5       <b>allowed to search whatever you want within their car,</b></p> <p>6       <b>if you arrest the person?</b></p> <p>7       A If it's open.</p> <p>8       <b>Q</b> If it's open?</p> <p>9       A Meaning, if they have access to it.</p> <p>10       <b>Q</b> If they have access. Okay. If they lock</p> <p>11       <b>the car, are you allowed to unlock it?</b></p> <p>12       A If they lock it, am I allowed to -- are they</p> <p>13       in the car?</p> <p>14       <b>Q</b> They're in your cruiser and they've locked</p> <p>15       <b>their car.</b></p> <p>16       A How would they lock their car?</p> <p>17       <b>Q</b> Maybe when they're getting arrested.</p> <p>18       A I don't understand that question.</p> <p>19       <b>Q</b> Okay. How about a consent search, how does</p> <p>20       <b>that look?</b></p> <p>21       A You want me to answer -- you want me to</p> <p>22       answer how does a consent search look?</p> <p>23       <b>Q</b> Yeah. Would you describe for me what a</p> <p>24       <b>consent search is?</b></p> <p>25       A A consent search?</p>
<p style="text-align: right;">Page 170</p> <p>1       search of a vehicle for a tow, you document those.</p> <p>2       <b>Q</b> So an incident to arrest -- am I right to</p> <p>3       <b>understand that every time you arrest a person in a</b></p> <p>4       <b>car, you can search their car?</b></p> <p>5       A It's an inventory search if you're towing</p> <p>6       it.</p> <p>7       <b>Q</b> Okay. How about for the search incident for</p> <p>8       <b>arrest? What if you're not towing it?</b></p> <p>9       A You don't have to search it every time.</p> <p>10       <b>Q</b> Can you? Are you permitted to search it</p> <p>11       <b>every time?</b></p> <p>12       A If you think it needs to be searched.</p> <p>13       <b>Q</b> And how do you determine whether it needs to</p> <p>14       <b>be searched?</b></p> <p>15       A It depends on the circumstances you're</p> <p>16       arresting the person for.</p> <p>17       <b>Q</b> And what -- what are those circumstances --</p> <p>18       <b>so when -- help me understand when you could search a</b></p> <p>19       <b>car and when you could not search a car based on</b></p> <p>20       <b>search incident to arrest.</b></p> <p>21       MS. ARRINDELL: Objection to the extent it</p> <p>22       calls for speculation. Calls for a hypothetical.</p> <p>23       A Search incident to arrest, you can search a</p> <p>24       car. There's no can and can't. If you lock them up,</p> <p>25       they're in the vehicle, you can search it.</p>	<p style="text-align: right;">Page 172</p> <p>1       <b>Q</b> Yes.</p> <p>2       A That's how it looks like, somebody giving</p> <p>3       consent to search their car.</p> <p>4       <b>Q</b> Okay. So -- so you ask permission and a</p> <p>5       <b>person searches the car?</b></p> <p>6       A If someone gives consent to search their</p> <p>7       car, then you can search their car.</p> <p>8       <b>Q</b> And are there circumstances when you, as an</p> <p>9       <b>officer, ask for permission to search a car?</b></p> <p>10       A Those circumstances may arise.</p> <p>11       <b>Q</b> What are those circumstances?</p> <p>12       A I don't know. That's too broad of a</p> <p>13       question to answer.</p> <p>14       <b>Q</b> Can you name some circumstance -- one</p> <p>15       <b>circumstance that could arise?</b></p> <p>16       A I can't think of any right now.</p> <p>17       <b>Q</b> So you can't think of any circumstances in</p> <p>18       <b>which you'd ask somebody to search their car?</b></p> <p>19       A Not off the top of my head right now.</p> <p>20       <b>Q</b> Okay. How about probable cause? Under what</p> <p>21       <b>circumstances are you allowed to search a car for</b></p> <p>22       <b>probable cause?</b></p> <p>23       MR. NORWOOD: Objection. Calls for a legal</p> <p>24       conclusion and speculation.</p> <p>25       A I'd have -- you need to be more specific.</p>

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<p style="text-align: right;">Page 173</p> <p>1 Q (By Mr. Waldron) So you -- you listed the</p> <p>2 several different instances in which somebody could</p> <p>3 search a car.</p> <p>4 You said "search incident to arrest." You</p> <p>5 said "a consent search." You said "probable cause."</p> <p>6 Would you describe for me when are you</p> <p>7 allowed to search a car related to this probable</p> <p>8 cause?</p> <p>9 MR. NORWOOD: Same objection.</p> <p>10 A I can't think of any clear circumstances off</p> <p>11 the top of my head. I mean, there's several, though.</p> <p>12 Q (By Mr. Waldron) What would one be?</p> <p>13 A There's several. I just can't think of any</p> <p>14 right now.</p> <p>15 Q And what's an inventory search?</p> <p>16 A An inventory.</p> <p>17 Q No, I'm asking what -- what is an inventory</p> <p>18 search?</p> <p>19 A It's an inventory.</p> <p>20 Q It's an inventory of what?</p> <p>21 A What are -- what are we searching?</p> <p>22 Q Under what conditions would you conduct an</p> <p>23 inventory search?</p> <p>24 A When I'm taking inventory of something.</p> <p>25 Q And when would you take inventory of</p>	<p style="text-align: right;">Page 175</p> <p>1 Q Is -- is the search that you conduct of an</p> <p>2 inventory search of a vehicle, is that different in</p> <p>3 any way than a probable cause search or a consent</p> <p>4 search? Are the procedures different or what you</p> <p>5 would search for different?</p> <p>6 A Are we talking about a vehicle?</p> <p>7 Q We're talking about these searches of a</p> <p>8 vehicle, yes.</p> <p>9 A I mean, a search is a search. It just</p> <p>10 depends on why you're searching it.</p> <p>11 Q Okay. So it would -- it would all be the</p> <p>12 same?</p> <p>13 MR. NORWOOD: Object. It mischaracterizes</p> <p>14 what he just said.</p> <p>15 A I mean, it depends on what kind of search it</p> <p>16 is. I mean, it's inventory, probable cause, incident</p> <p>17 to arrest.</p> <p>18 Q (By Mr. Waldron) Right. So what I'm --</p> <p>19 A Fear of a weapon.</p> <p>20 (Reporter clarification.)</p> <p>21 Q (By Mr. Waldron) And what I'm trying to get</p> <p>22 to is an inventory search. Is there anything that</p> <p>23 distinguishes an inventory search from an incident to</p> <p>24 arrest search?</p> <p>25 A An inventory search is of an item incident</p>
<p style="text-align: right;">Page 174</p> <p>1 something?</p> <p>2 A It depends on what the situation is.</p> <p>3 Q Can you describe for me an inventory search</p> <p>4 that you've conducted?</p> <p>5 A I can't think of one off the top of my head.</p> <p>6 Q Have you ever conducted one?</p> <p>7 A Yes.</p> <p>8 Q And what did that look like?</p> <p>9 A An inventory search.</p> <p>10 Q Do all cars get an inventory search or only</p> <p>11 certain cars?</p> <p>12 A So are we talking about cars now?</p> <p>13 Q Yeah. So I was referring to an inventory</p> <p>14 search that I think that you had listed. The kind</p> <p>15 that you had designated as one of the types of</p> <p>16 searches that you conduct of a car.</p> <p>17 A So you're being specific. We're talking</p> <p>18 about an inventory search of a vehicle now?</p> <p>19 Q Yes, sir.</p> <p>20 A If you are locked up and your vehicle's</p> <p>21 being towed, there's an inventory search of your</p> <p>22 vehicle.</p> <p>23 Q And is that search different from any of the</p> <p>24 other searches of vehicles that we've talked about?</p> <p>25 A I'm confused about that question.</p>	<p style="text-align: right;">Page 176</p> <p>1 to arrest.</p> <p>2 Q Okay. Are you -- have you been given</p> <p>3 instructions from the City of Ferguson about how to</p> <p>4 carry out an inventory search?</p> <p>5 A No. I think we learned that in the academy</p> <p>6 searches.</p> <p>7 Q Okay. And describe for me how do you</p> <p>8 conduct an inventory search of a car.</p> <p>9 A Search it.</p> <p>10 Q And do you collect anything or do you just</p> <p>11 look through it? Is there anything that you would</p> <p>12 ever confiscate or gather?</p> <p>13 A If there are personal items that can go with</p> <p>14 the property of the subject arrested, then it's</p> <p>15 gathered and put with the property.</p> <p>16 Q And it -- so it's just personal items that</p> <p>17 are gathered?</p> <p>18 A Not personal, no, not all of it -- I'm</p> <p>19 sorry. Let me rephrase. Can I strike that? No, I</p> <p>20 don't get to strike? Damn.</p> <p>21 Items of value, okay, that can be placed in</p> <p>22 a subject's property. And if they can't be placed in</p> <p>23 a subject's property, then they are listed on the tow</p> <p>24 sheet if they're of value.</p> <p>25 Q Okay. And when would they not be able to be</p>

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<p style="text-align: right;">Page 177</p> <p>1 placed in the -- in the person -- an arrestee's</p> <p>2 property?</p> <p>3 A It's too big.</p> <p>4 Q Okay. So it's too big. That makes sense.</p> <p>5 And who do you give the -- the items of</p> <p>6 value that you find, what happens to it? Does it go</p> <p>7 along with the -- the person who's being arrested?</p> <p>8 Who -- who is in control of it?</p> <p>9 A At what point?</p> <p>10 Q When it's -- when it's first found.</p> <p>11 A First found when?</p> <p>12 Q When it's first found in the vehicle.</p> <p>13 A So items of value that I find in a vehicle</p> <p>14 if they are too big, they stay with the vehicle.</p> <p>15 Q Got it.</p> <p>16 A If they are manageable, they go with the</p> <p>17 suspect.</p> <p>18 Q They go with the suspect. And they would</p> <p>19 be -- they're provided to property -- to -- to the</p> <p>20 property department, is that right, of the jail?</p> <p>21 A The jail doesn't have a property department.</p> <p>22 Q Okay. So what happens to those -- to those</p> <p>23 items?</p> <p>24 A They would be with the subject's property</p> <p>25 bag.</p>	<p style="text-align: right;">Page 179</p> <p>1 traffic matter?</p> <p>2 A Are they under arrest?</p> <p>3 Q Yes.</p> <p>4 A Were they in the vehicle when I placed them</p> <p>5 under arrest?</p> <p>6 Q Yes.</p> <p>7 A Then I would search the car.</p> <p>8 Q Okay. And for what -- which of the reasons</p> <p>9 that you stated?</p> <p>10 A Search incident to arrest.</p> <p>11 Q And do you know what the purpose of the</p> <p>12 search incident to arrest is?</p> <p>13 A Locate weapons, drugs, illegal items.</p> <p>14 Q Even if it's just a traffic violation?</p> <p>15 A I mean, the traffic violation was why I</p> <p>16 locked them up. Also to make sure nothing of value is</p> <p>17 left inside the vehicle when it's parked.</p> <p>18 Q And that would be -- that would be an</p> <p>19 inventory search; right?</p> <p>20 A I mean, you can cross the two if you like.</p> <p>21 (Reporter clarification.)</p> <p>22 Q (By Mr. Waldron) Are you allowed to go up to</p> <p>23 a person on the street and ask them to identify</p> <p>24 themselves?</p> <p>25 MS. ARRINDELL: Objection. Relevance.</p>
<p style="text-align: right;">Page 178</p> <p>1 Q And who would record that?</p> <p>2 A Record it where?</p> <p>3 Q Who would take note of, you know, one iPhone</p> <p>4 was found in the back of a car that's -- that's a</p> <p>5 personal item, it's an item of value, how would they</p> <p>6 know that when a person's arrested, it goes with this</p> <p>7 person?</p> <p>8 A The CO would have made an inventory of the</p> <p>9 bag. Corrections officer.</p> <p>10 Q The corrections officer. Thank you. And so</p> <p>11 it's up to the individual officers to determine</p> <p>12 whether or not something's an item of value?</p> <p>13 A I mean, money, jewelry, phones in operating</p> <p>14 condition, et cetera, et cetera.</p> <p>15 Q Going back to the other searches that aren't</p> <p>16 inventory searches, but we're still talking about</p> <p>17 vehicles here. Are you allowed to search a vehicle</p> <p>18 for a traffic violation after arresting that person if</p> <p>19 you're not going to tow the vehicle?</p> <p>20 MR. NORWOOD: Let me object. Improper</p> <p>21 hypothetical. It calls for speculation.</p> <p>22 A So I'm not towing the car?</p> <p>23 Q (By Mr. Waldron) You're not towing the car.</p> <p>24 Within -- have you been trained -- within your</p> <p>25 training, are you allowed to search the car if it's a</p>	<p style="text-align: right;">Page 180</p> <p>1 A You want to know if I can walk up to</p> <p>2 somebody and ask their name?</p> <p>3 Q (By Mr. Waldron) As an officer.</p> <p>4 A Why wouldn't I be?</p> <p>5 Q Okay. Are you allowed to -- what happens if</p> <p>6 they -- if they don't give their name?</p> <p>7 MR. NORWOOD: Objection. Improper</p> <p>8 hypothetical. Speculation.</p> <p>9 MS. ARRINDELL: Join in that objection.</p> <p>10 Q (By Mr. Waldron) Are you familiar with the</p> <p>11 term a "detention," when you detain someone?</p> <p>12 A Yes.</p> <p>13 Q To talk with them; right?</p> <p>14 A Well, I don't have to detain somebody to</p> <p>15 talk to them.</p> <p>16 Q Okay. But let's -- let's -- for the</p> <p>17 purposes of right now, let's just talk about detaining</p> <p>18 someone; right? Do you understand?</p> <p>19 A (Witness nods.)</p> <p>20 Q Okay. So for the purposes of detaining a</p> <p>21 person, can you detain anyone?</p> <p>22 A What are they detained for?</p> <p>23 Q I'm asking you, are you allowed to detain</p> <p>24 any person or do you need something special in order</p> <p>25 to detain a person?</p>

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<p>1 Overbroad. Calls for speculation. Witness has asked 2 for clarification. 3 MR. NORWOOD: And I'd object, too, as it 4 calls for a legal conclusion with respect to what's 5 allowable, and also it's an improper hypothetical. 6 And I join in Geri Lynn's objection also. 7 A Repeat the question again. 8 <b>Q (By Mr. Waldron) If you detain a person --</b> 9 <b>A Uh-huh.</b> 10 <b>Q -- are you allowed to ask for their</b> 11 <b>identification?</b> 12 <b>A What am I detaining them for?</b> 13 <b>Q No matter what you detain them for.</b> 14 MR. NORWOOD: Well, let me object then. 15 That -- that -- that's an improper hypothetical. It's 16 overbroad and it's -- 17 MR. WALDRON: You can have a running 18 objection to this just so that we don't get -- 19 MR. NORWOOD: I'm going to make my objection 20 the way I want to make my objection. You can run with 21 whatever you want to run with. 22 On this particular question, it's an 23 improper hypothetical, it's overbroad, and it calls 24 for a legal conclusion. 25 <b>A Can you rephrase the question?</b></p>	<p>1 <b>Q Do you see a time listed about a third of</b> 2 <b>the way down the page for "Received Date"?</b> 3 <b>A Yes.</b> 4 <b>Q What time is indicated by that?</b> 5 <b>A 2017.</b> 6 <b>Q Did you fill this form out?</b> 7 <b>A This report?</b> 8 <b>Q Yes.</b> 9 <b>A No. I don't enter these into the -- we</b> 10 <b>didn't enter these into the computer at the time.</b> 11 <b>Q Who did?</b> 12 <b>A Records.</b> 13 <b>Q Who worked in records?</b> 14 <b>A I don't recall.</b> 15 <b>Q So there was a records department?</b> 16 <b>A Still is.</b> 17 <b>Q And is it within the police department or</b> 18 <b>just within the larger City of Ferguson?</b> 19 <b>A It's for the police department.</b> 20 <b>Q So you wouldn't have filled this out?</b> 21 <b>A I wouldn't have entered the information, no.</b> 22 <b>Q Where would the information on this have</b> 23 <b>come from?</b> 24 <b>A To enter?</b> 25 <b>Q Yes, to enter.</b></p>
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<p>1 <b>Q (By Mr. Waldron) You've detained a person.</b> 2 <b>Are you allowed to ask for their identification?</b> 3 <b>A That's the same question.</b> 4 <b>Q And I haven't got an answer yet. I'm just</b> 5 <b>trying to get one.</b> 6 <b>A I don't understand it. Can you rephrase it?</b> 7 <b>Q Would it be helpful if I gave a</b> 8 <b>hypothetical?</b> 9 <b>A No, but you can try.</b> 10 <b>Q All right. Let's move on. Are we on</b> 11 <b>Exhibit 5? Is that correct?</b> 12 <b>A Yes, 5.</b> 13 (Exhibit 5, Police Report, was marked 14 for identification.) 15 MR. WALDRON: This is Plaintiff's Exhibit 5. 16 And this is one version of the police report. It's 17 designated WATSON_0041, 42, 43, 44, and 45. 18 <b>Q (By Mr. Waldron) Officer Boyd, do you</b> 19 <b>recognize this document?</b> 20 <b>A Yes, it looks familiar.</b> 21 <b>Q And what is it?</b> 22 <b>A It is a Ferguson Police Department Offense</b> 23 <b>Incident Report.</b> 24 <b>Q And is it the arrest report for Mr. Watson?</b> 25 <b>A It appears to be.</b></p>	<p>1 <b>A They would have gotten the information to</b> 2 <b>enter from me.</b> 3 <b>Q Okay. How would you have provided it to</b> 4 <b>them?</b> 5 <b>A Incident sheets and the supplement narrative</b> 6 <b>sheet.</b> 7 <b>Q So you did not enter this into the</b> 8 <b>computer -- into a computer or anything else?</b> 9 <b>A No.</b> 10 <b>Q How -- you said there's an incident sheet?</b> 11 <b>A Incident sheets.</b> 12 <b>Q And where did you fill out an incident</b> 13 <b>sheet?</b> 14 <b>A We have copies -- we had copies of them.</b> 15 <b>Q Would you -- could I ask you to turn to the</b> 16 <b>last page.</b> 17 <b>A Yes.</b> 18 <b>Q Just so that we can all sort of figure this</b> 19 <b>out as soon as possible, is this an incident sheet?</b> 20 <b>A This is part of the report that I prepared,</b> 21 <b>yes.</b> 22 <b>Q Okay. So this is part of the report that</b> 23 <b>you prepared. And would you have typed this page?</b> 24 <b>A Oh, yes, I would have typed this.</b> 25 <b>Q And on what program would you have typed it?</b></p>

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<p>1 A Word. I --</p> <p>2 Q Okay. Do you remember that exactly or</p> <p>3 you're just --</p> <p>4 A No, I don't remember. I don't recall what</p> <p>5 program.</p> <p>6 Q And if I understand it correctly, you would</p> <p>7 type this sheet called an "Incident Sheet," and</p> <p>8 somebody in records would then convert it to this</p> <p>9 document on the front page that's page 41, which is</p> <p>10 called the "Incident Report"; is that correct?</p> <p>11 A That is how the process should work.</p> <p>12 Q That is how the process -- and is it -- is</p> <p>13 it how the process did work generally?</p> <p>14 A Generally.</p> <p>15 Q Okay. Good. All right. So if there's</p> <p>16 information on this first page that is not on page 45,</p> <p>17 do you know where it came from?</p> <p>18 A No.</p> <p>19 Q Okay. Under the name of the officers, it</p> <p>20 says your name in the middle of the page, and then it</p> <p>21 says "PO/K-9 Gregory Casem and PO Todd Mink." Does</p> <p>22 that refresh your memory about who was at the scene?</p> <p>23 A Yes, it says that they were there.</p> <p>24 Q Does that -- does reading that bring</p> <p>25 anything back about their presence at the scene?</p>	<p>1 is only filled out for certain types of violations and</p> <p>2 not for others?</p> <p>3 A No.</p> <p>4 Q So for all citations, all traffic stops,</p> <p>5 there's an incident report filled out?</p> <p>6 A Well, the ticket is the report for traffic</p> <p>7 violations.</p> <p>8 Q All right. So would you help me to</p> <p>9 understand the difference between traffic violations</p> <p>10 and other violations?</p> <p>11 A There's traffic and non-traffic.</p> <p>12 Q And traffic is what? Everything relating to</p> <p>13 a car?</p> <p>14 A Related to traffic.</p> <p>15 Q Relating to traffic. And help me to clarify</p> <p>16 there. You sort of corrected me. What is the</p> <p>17 difference -- traffic -- between traffic and cars?</p> <p>18 A I don't understand the question.</p> <p>19 Q Well, I -- I just felt like you corrected</p> <p>20 and that there was something diff -- distinct about</p> <p>21 what a traffic offense is.</p> <p>22 A Traffic.</p> <p>23 Q Okay. Is manner of walking a traffic</p> <p>24 violation?</p> <p>25 A That is non-traffic.</p>
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<p>1 A Not at this time.</p> <p>2 Q How about -- does the K-9 next to "K-9</p> <p>3 Gregory Casem" mean he had a dog with him?</p> <p>4 A It means he's a K-9 officer.</p> <p>5 Q So it doesn't necessarily mean he had a dog?</p> <p>6 A Sometimes they don't have their dogs.</p> <p>7 Q Okay. And what was the departed date --</p> <p>8 right above your name, it says the "Departed Date"?</p> <p>9 A 8/1 of '12.</p> <p>10 Q Yep. And what's the -- what's the time?</p> <p>11 A 2210.</p> <p>12 Q And that would be 10:10 p.m.; correct?</p> <p>13 A Yes.</p> <p>14 Q Do you know where that time would have come</p> <p>15 from?</p> <p>16 A No, I do not.</p> <p>17 Q And what are the charges here?</p> <p>18 A Listed on the incident page?</p> <p>19 Q Yes.</p> <p>20 A Failure to obey, obstructing, resisting,</p> <p>21 et cetera, city official.</p> <p>22 Q And any others?</p> <p>23 A Oh, it skips two lines and it says "Making</p> <p>24 false declaration."</p> <p>25 Q Is it correct to say that an incident report</p>	<p>1 Q Non-traffic. So that would be an incident</p> <p>2 report?</p> <p>3 A That would be an ANF, depending on what you</p> <p>4 did.</p> <p>5 Q And what -- what -- did you say ANF?</p> <p>6 A Arrest Notification Form.</p> <p>7 Q A-N-F. And do you see at the bottom of this</p> <p>8 document, on the left-hand side, it says "Reporting</p> <p>9 Officer, 590, Eddie Boyd, III." Do you see that?</p> <p>10 A Yes.</p> <p>11 Q And it says "Approving Officer." Is there</p> <p>12 an approving officer?</p> <p>13 A On this document you provided?</p> <p>14 Q Yes.</p> <p>15 A No.</p> <p>16 Q How did the approval process work?</p> <p>17 A I do not know. I sent it up for approval</p> <p>18 and from there it's the next level.</p> <p>19 Q And who did you send it to?</p> <p>20 A My sergeant or lieutenant at the time.</p> <p>21 Q Who would your sergeant or lieutenant have</p> <p>22 been at the time?</p> <p>23 A I don't recall.</p> <p>24 Q And when you said "sent it up," what does</p> <p>25 that mean?</p>

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<p>1 A Turned in my prepared report and they viewed</p> <p>2 it. And if there are any corrections that need to be</p> <p>3 made and you corrected it, or they sent it back to</p> <p>4 have the corrections made and -- no corrections needed</p> <p>5 to be made then it was forwarded.</p> <p>6 Q It was forwarded to who?</p> <p>7 A I do not know the process from when I turned</p> <p>8 it in to my supervisor.</p> <p>9 Q Okay.</p> <p>10 A But ultimately it ends up with records.</p> <p>11 Q Okay. So records doesn't write it until</p> <p>12 it's been approved?</p> <p>13 A I'm not sure how that works with them.</p> <p>14 Q Okay. And you said sometimes it gets sent</p> <p>15 back for corrections, reports get sent back for</p> <p>16 corrections?</p> <p>17 A They can send them back with corrections.</p> <p>18 Q And do you know what those would be? Like</p> <p>19 can you give me an example of what a correction would</p> <p>20 look like?</p> <p>21 A Misspelled word.</p> <p>22 Q Okay. Anything besides spelling or grammar?</p> <p>23 A There could be a few things, but I can't</p> <p>24 think of anything else off the top of my head.</p> <p>25 Q Okay. Because, generally, the supervisors</p>	<p>1 Q That that -- that that happened.</p> <p>2 A Oh, this is the incident?</p> <p>3 Q Yes.</p> <p>4 A Yes.</p> <p>5 Q And you're looking on the back page, I</p> <p>6 noticed. Is that because that's the page that you</p> <p>7 actually wrote?</p> <p>8 A Yes.</p> <p>9 Q Okay. Understood.</p> <p>10 And it says "As I approached the vehicle's</p> <p>11 location, I could make out a subject moving around</p> <p>12 inside." Does that reflect what you remember?</p> <p>13 A Yes.</p> <p>14 Q And the next sentence says, it should be</p> <p>15 noted we have several car break-ins in the</p> <p>16 above-mentioned location with the black tint -- with a</p> <p>17 black tinted windows.</p> <p>18 MS. ARRINDELL: Objection. Misstates what</p> <p>19 is typed.</p> <p>20 MR. WALDRON: I'm more than happy for you to</p> <p>21 correct me if I -- if I missed something, Geri Lynn.</p> <p>22 I'm not sure.</p> <p>23 MS. ARRINDELL: The word "vehicle," it was</p> <p>24 just skipped.</p> <p>25 MR. WALDRON: Oh, thank you.</p>
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<p>1 wouldn't have been there; right?</p> <p>2 A Been where?</p> <p>3 Q At -- at the incident that you're writing</p> <p>4 about or that an officer's writing about.</p> <p>5 A It depends.</p> <p>6 Q It depends. Okay. Let's look at the next</p> <p>7 page. Actually, I apologize. I'm going to read</p> <p>8 starting at the -- the bottom of page 41, the first</p> <p>9 page.</p> <p>10 It says, "On 8/1/12 at 2017 hours while</p> <p>11 patrolling Forestwood Park located at 825 Forestwood,</p> <p>12 I observed a black 2011 Buick 4-door sedan. Vine" --</p> <p>13 and then it's got a long set of -- "1G4GE5EDXBF279655.</p> <p>14 Idling with the headlights on, no front plate, heavy</p> <p>15 tinted windows and windshield, backed into a parking</p> <p>16 space along the tree line." Did I read that</p> <p>17 correctly?</p> <p>18 A It says "Vine" but, yeah.</p> <p>19 Q It says "The vehicle was facing the obstacle</p> <p>20 course where several small children were playing,</p> <p>21 unsupervised." Did I read that correctly?</p> <p>22 A Oh. Yes, yes, yes.</p> <p>23 Q And as far as you know, is that -- is that</p> <p>24 true so far, in your report?</p> <p>25 A Was what true? The -- the spelling --</p>	<p>1 MS. ARRINDELL: No problem.</p> <p>2 MR. WALDRON: In that last sentence?</p> <p>3 MS. ARRINDELL: You said "Black tinted</p> <p>4 windows" instead of "Black vehicle tinted windows."</p> <p>5 MR. WALDRON: Oh. Thank you. "Black</p> <p>6 vehicle tinted windows." Thank you.</p> <p>7 MS. ARRINDELL: No problem.</p> <p>8 Q (By Mr. Waldron) Do you recall that there</p> <p>9 had been break-ins -- several car break-ins with black</p> <p>10 vehicles with tinted windows?</p> <p>11 A We had a report of a black vehicle with</p> <p>12 tinted windows that was breaking into vehicles. Yeah,</p> <p>13 I recall that.</p> <p>14 Q And where do you recall that report</p> <p>15 happening?</p> <p>16 A They said it was up at the park.</p> <p>17 Q And how did you hear about that report?</p> <p>18 A I do not recall.</p> <p>19 Q Would there be a record of a report like</p> <p>20 that?</p> <p>21 A There may be.</p> <p>22 Q Okay. The next sentence says, "I exited my</p> <p>23 marked patrol vehicle and approached the driver's side</p> <p>24 door where I made contact with the driver, who</p> <p>25 identified himself as Fred Watson, 6'0" tall,</p>

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<p style="text-align: right;">Page 197</p> <p>1 197 pounds," 109 -- "1924 West Laura, Pensacola, 2 Florida." 3 Did anything else, to your memory, happen 4 before you approached the car? In -- in the sequence 5 that we're going in here? 6 A Well, there was a mistake that I made in the 7 report. It should have been "who later identified 8 himself." But that was my bad. 9 Q So that should say "who later identified 10 himself"? 11 A Yes. 12 Q So your report says that he identified 13 himself; right? 14 A Yes. 15 Q And later he identified himself as that? 16 A After I asked for his license, proof of 17 insurance, he didn't have it. And then I requested 18 his pedigree information, and that's who he identified 19 himself as. 20 Q Okay. So this report is incorrect? 21 A I left out a word. So if the entire report 22 is incorrect for leaving out a word -- 23 Q No. I mean, this -- that detail of this 24 report is incorrect? 25 A I left out a word. So if the entire report</p>	<p style="text-align: right;">Page 199</p> <p>1 have been from him. 2 Q Okay. So you -- could you have put this in 3 later? 4 A Put what in later? 5 Q This information about his height, his 6 weight, his address. 7 A I mean, anything's possible, but this is 8 what I would use to try to verify his identity -- 9 Q And you -- 10 A -- because he didn't have his license in his 11 possession. 12 Q You would have used his height and weight to 13 identify his identity? 14 A It would have been part of it. 15 Q It would have been -- and which program 16 would have -- would have helped you find his identity 17 based on his height and weight? 18 A There would be a combination of all the 19 information to verify the information that he gave. 20 He gave his name, date of birth, height, weight, and 21 address. That's all the stuff that would be listed on 22 an operator's license or non-driver's license. 23 Q And if he didn't provide it to -- to you, 24 where would you find that information? 25 A I mean, if he omitted or left out a line,</p>
<p style="text-align: right;">Page 198</p> <p>1 is incorrect, then so be it. 2 Q Okay. And where did you get the -- the 3 information about 6'0" and -- and that other 4 information? 5 A I would have got it from him if I'm asking 6 for his name and pedigree information. 7 Q Was that common for you to ask for 8 somebody's height and weight? 9 A Depends on what the situation is. 10 Q Does it indicate to you that you asked him 11 for this information? 12 A Yeah. If he didn't have a license, proof of 13 insurance, then, yeah, I probably would have asked for 14 height and weight. 15 Q And would you have asked for his address? 16 A Yes. 17 Q And this is the address he provided? 18 A Had to be. I wouldn't have pulled it from 19 anywhere else. 20 Q Is the only place you could have got this 21 information -- 22 A From him? 23 Q From anywhere? From REJ -- from REJIS, from 24 anywhere else? 25 A At the time at the side of the car, it would</p>	<p style="text-align: right;">Page 200</p> <p>1 then I wouldn't be able to find it. 2 Q No, I understand that. Where would you be 3 able to verify that -- to find some other source 4 saying, "Yeah, this a 6' tall, 197-pound guy?" 5 A If he told the truth -- 6 Q Yes. 7 A -- it would be in his record. Because it 8 would be listed on his driver's or non-driver's 9 license. 10 Q And when you say "record," what do you mean? 11 Which -- which report? 12 A Department of Revenue or any other place. 13 Q Or REJIS? 14 A REJIS is a system. It's not the Department 15 of Revenue. Department of Revenue sends a response to 16 REJIS. 17 Q Okay. So as we -- as we've read this, is 18 there anything that's -- the sequence is incorrect so 19 far? 20 A Yes. The sequence is incorrect so far. 21 Q What's incorrect? 22 A I would have asked him for his license and 23 proof of insurance before I obtained his pedigree 24 information. 25 Q But that's not represented here in the</p>

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<p>1 report?</p> <p>2 A That I asked for his pedigree information?</p> <p>3 Q That you would have asked for his license</p> <p>4 and to the point that we are -- to the point that</p> <p>5 we're at. You said you would have asked for his</p> <p>6 license beforehand?</p> <p>7 A Yeah. When I walked up, advised him of the</p> <p>8 violations, I would have asked for his license and</p> <p>9 proof of insurance.</p> <p>10 Q Okay. So you -- you're just getting ahead</p> <p>11 of us for a second. But at the -- at the words</p> <p>12 "Pensacola, Florida," everything up to there, the</p> <p>13 sequence is okay?</p> <p>14 A Except for later.</p> <p>15 Q Except for later. Right.</p> <p>16 And it says "And advised him of the</p> <p>17 violations and my observations." What were the</p> <p>18 violations?</p> <p>19 MR. NORWOOD: Let me object. Asked and</p> <p>20 answered. We've gone over that already.</p> <p>21 Q (By Mr. Waldron) Subject to that.</p> <p>22 A Oh, you want me to repeat it?</p> <p>23 Q What were the violations that you had</p> <p>24 identified at that point?</p> <p>25 MR. NORWOOD: Objection. Asked and</p>	<p>1 this, is that he provided his pedigree information?</p> <p>2 A Yes.</p> <p>3 Q Okay. So he's provided his pedigree</p> <p>4 information. And then next it says, "He advised he</p> <p>5 was not doing anything wrong and I had no right to</p> <p>6 bother him."</p> <p>7 Do you recall that?</p> <p>8 A Where we at?</p> <p>9 Q We're at the paragraph that starts with the</p> <p>10 word "Watson."</p> <p>11 A Oh. Okay.</p> <p>12 Q I'll read it again.</p> <p>13 "He advised he was not doing anything wrong</p> <p>14 and I had no right to bother him. He said I was</p> <p>15 violating his Fifth Amendment right after I instructed</p> <p>16 him not to use his cell phone when he was detained for</p> <p>17 officer safety reasons."</p> <p>18 Does that agree with what you recall from</p> <p>19 the incident?</p> <p>20 A That's what's written.</p> <p>21 Q Do you have any recollection independent of</p> <p>22 what's written?</p> <p>23 A I can't think of anything right now.</p> <p>24 Q Okay. Is a person allowed to use their cell</p> <p>25 phone at a -- at a traffic stop?</p>
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<p>1 answered.</p> <p>2 MS. ARRINDELL: Join in that objection.</p> <p>3 MR. NORWOOD: Multiple times.</p> <p>4 A No front plate. Heavy tinted windows.</p> <p>5 Q (By Mr. Waldron) Okay. Next says, "I</p> <p>6 requested his driver's license and proof of insurance</p> <p>7 to which he advised he did not have his license on him</p> <p>8 and his insurance card was somewhere in the vehicle.</p> <p>9 He did not know where it was."</p> <p>10 Any reason to disagree with that sentence?</p> <p>11 A No.</p> <p>12 Q Next says, "Watson became enraged as I</p> <p>13 attempted to retrieve his pedigree information."</p> <p>14 What pedigree information were you trying to</p> <p>15 retrieve?</p> <p>16 A Name, date of birth.</p> <p>17 Q And he didn't provide it to you?</p> <p>18 A It says, "He became engaged." It didn't say</p> <p>19 he didn't give it.</p> <p>20 Q Okay. So he did give his pedigree</p> <p>21 information?</p> <p>22 A Didn't say that he didn't give it in here.</p> <p>23 Q I'm sorry?</p> <p>24 A Did not say that he didn't give it in here.</p> <p>25 Q Okay. So your understanding, from reading</p>	<p>1 A They can.</p> <p>2 Q They can. What about here where it says you</p> <p>3 instructed him not to use his cell phone when he was</p> <p>4 detained for officer safety reasons?</p> <p>5 A Then he couldn't.</p> <p>6 Q Okay. And so in what circumstances would</p> <p>7 officer's -- officer's safety dictate that it can't be</p> <p>8 used?</p> <p>9 A If I felt like they were calling somebody</p> <p>10 there to ambush me or to do harm to me. Things along</p> <p>11 those nature -- that nature.</p> <p>12 Q And is it fair to say that you -- that you</p> <p>13 suspected that to be the case because you told him not</p> <p>14 to use the cell phone?</p> <p>15 A Because he was combative and argumentative.</p> <p>16 Q So you believed that he was going to call to</p> <p>17 ambush -- or to call somebody?</p> <p>18 A Yeah. Call somebody to ambush me, attack</p> <p>19 me.</p> <p>20 Q Okay. And next it says, "Upon arrival of my</p> <p>21 assists, PO Todd Mink, DSN 486, I instructed Watson to</p> <p>22 exit the vehicle so I could pat him down for weapons."</p> <p>23 Is that correct as you remember it?</p> <p>24 A I asked him to exit the vehicle before</p> <p>25 that -- before the assist arrived and that he was</p>

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<p style="text-align: right;">Page 209</p> <p>1 about the Ferguson ordinances?</p> <p>2 <b>Q Well, I was -- I was just referring to</b></p> <p>3 <b>policies. But I think we can try -- I mean, I think</b></p> <p>4 <b>we can get to this. I don't think this is that</b></p> <p>5 <b>difficult.</b></p> <p>6 <b>What I'm trying to understand is, as an</b></p> <p>7 <b>officer, do you always have the right to instruct a</b></p> <p>8 <b>person to get out of their vehicle if they're at a</b></p> <p>9 <b>traffic stop?</b></p> <p>10 MR. NORWOOD: Objection. Calls for</p> <p>11 speculation. Improper hypothetical. And a legal</p> <p>12 conclusion.</p> <p>13 MS. ARRINDELL: Concur.</p> <p>14 A What am I pulling them out of the car for?</p> <p>15 <b>Q (By Mr. Waldron) For any reason. Are you</b></p> <p>16 <b>allowed to?</b></p> <p>17 A Why?</p> <p>18 <b>Q Are you allowed to?</b></p> <p>19 A But for what? You need to tell me why I'm</p> <p>20 pulling them out of the car.</p> <p>21 <b>Q So you need a reason to have them come out</b></p> <p>22 <b>of the car; is that right?</b></p> <p>23 A For your example, I would like one. I don't</p> <p>24 understand what you're getting at. You're asking me</p> <p>25 am I allowed to pull anybody out of a vehicle?</p>	<p style="text-align: right;">Page 211</p> <p>1 A I don't see where Officer Casem did anything</p> <p>2 besides showed up.</p> <p>3 <b>Q Okay. I think the next part where it says</b></p> <p>4 <b>"He refused," do you see where I am, it's underneath</b></p> <p>5 <b>Officer Mink's name?</b></p> <p>6 A Yes.</p> <p>7 <b>Q "He refused to exit the vehicle and after</b></p> <p>8 <b>the fifth time of instructing him to exit the vehicle,</b></p> <p>9 <b>he was advised he was under arrest for failure to obey</b></p> <p>10 <b>an officer, and that if he didn't exit the vehicle, he</b></p> <p>11 <b>would be tased."</b></p> <p>12 <b>This is the first mention I've seen of him</b></p> <p>13 <b>being under arrest in this report. Do you agree?</b></p> <p>14 A Yes.</p> <p>15 <b>Q But it's your testimony that you actually</b></p> <p>16 <b>instructed him that he was under arrest earlier in the</b></p> <p>17 <b>stop; is that correct?</b></p> <p>18 A Before the assist got there, yes.</p> <p>19 <b>Q Before the assist. You just didn't include</b></p> <p>20 <b>it until later on? You just --</b></p> <p>21 A It's not in the report.</p> <p>22 <b>Q It's not in the report; right?</b></p> <p>23 A Yes.</p> <p>24 <b>Q Okay. "He raised his windows up and moments</b></p> <p>25 <b>later reluctantly exited the vehicle where he was</b></p>
<p style="text-align: right;">Page 210</p> <p>1 <b>Q Yeah.</b></p> <p>2 A Why?</p> <p>3 <b>Q So that's what I'm trying to figure out.</b></p> <p>4 <b>Are you allowed to? You don't know?</b></p> <p>5 A I didn't say that. I'm asking you why am I</p> <p>6 pulling them out of the car? Why am I pulling them</p> <p>7 over.</p> <p>8 <b>Q You -- let's say you feel unsafe. Officer</b></p> <p>9 <b>safety.</b></p> <p>10 MR. NORWOOD: Well, let me object. That's</p> <p>11 vague and ambiguous as well. We've got compound,</p> <p>12 vague and ambiguous.</p> <p>13 <b>Q (By Mr. Waldron) All right. Let's go back</b></p> <p>14 <b>into this. So the -- you mention that Officer Casem,</b></p> <p>15 <b>who's on the front page, is not here. Any particular</b></p> <p>16 <b>reason or just a typo?</b></p> <p>17 MS. ARRINDELL: Objection. It</p> <p>18 mischaracterizes his testimony.</p> <p>19 A Can you repeat the question?</p> <p>20 <b>Q (By Mr. Waldron) Is the only reason that</b></p> <p>21 <b>Officer Casem is not here is just because of a --</b></p> <p>22 <b>there's no --</b></p> <p>23 A I'm sorry.</p> <p>24 <b>Q -- there's no reason behind it other than</b></p> <p>25 <b>you just forgot?</b></p>	<p style="text-align: right;">Page 212</p> <p>1 <b>taken into custody and all resisting ceased."</b></p> <p>2 <b>What do you mean "all resisting ceased"?</b></p> <p>3 A He was not exiting the vehicle after he was</p> <p>4 told he was under arrest.</p> <p>5 <b>Q So that was resisting?</b></p> <p>6 A Yes.</p> <p>7 <b>Q Okay.</b></p> <p>8 <b>"After placing him into handcuffs, he kicked</b></p> <p>9 <b>the driver's door closed in an attempt to lock it as</b></p> <p>10 <b>if he was trying to conceal something."</b></p> <p>11 <b>Why did you include that detail?</b></p> <p>12 A Because that's what he did.</p> <p>13 <b>Q And so you tried to include all the details</b></p> <p>14 <b>that you could remember; right?</b></p> <p>15 A The ones that -- all the ones that I could</p> <p>16 remember, yes.</p> <p>17 <b>Q Except for the one where you told him he was</b></p> <p>18 <b>under arrest before the assist came; right?</b></p> <p>19 A I said I didn't remember it at the time of</p> <p>20 the report.</p> <p>21 <b>Q And the next sentence says, "The door did</b></p> <p>22 <b>not lock and a search incident to arrest revealed his</b></p> <p>23 <b>real name was Freddie Watson, 115 Monteith, St. Louis,</b></p> <p>24 <b>Missouri 63137." And then it says, on the top of the</b></p> <p>25 <b>next page, "5'11", 175 pounds."</b></p>

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<p style="text-align: right;">Page 213</p> <p>1           <b>So you searched -- this indicates that you</b>  2       <b>searched his vehicle, incident to his arrest?</b>  3       A   Yes.  4       <b>Q   And do you know what you found that provided</b>  5       <b>his name and address?</b>  6       A   I don't recall exactly what it was.  7       <b>Q   Do you know where the height came from?</b>  8       A   The Department of Revenue response from  9       Missouri.  10       <b>Q   So do you know -- do you know where the</b>  11       <b>height -- why the height would be different from the</b>  12       <b>height provided above?</b>  13       A   That's what's listed on the expired license  14       and the first one is what he gave me.  15       <b>Q   So he -- it's your testimony that he told</b>  16       <b>you "I am 6' tall and I'm a 197 pounds"?</b>  17       A   That's where I would have got it from. From  18       him.  19       <b>Q   And that's the only place you would have got</b>  20       <b>it?</b>  21       A   That's where I would have got it from.  22       <b>Q   Okay. Next it says, "Watson was additional</b>  23       <b>charged with making a 'false statement.'"</b>  24       <b>What's the false statement that he made?</b>  25       A   I'd have to read the complaint for the</p>	<p style="text-align: right;">Page 215</p> <p>1       A   No, I don't recall at this time.  2       <b>Q   The next sentence says, "A REJIS computer</b>  3       <b>search -- computer check of Freddie Watson,</b>  4       <b>F-r-e-d-d-i-e, revealed an expired operator's license</b>  5       <b>through Missouri that had not been surrendered to</b>  6       <b>another state."</b>  7       <b>How would you have got that information?</b>  8       A   Through, I guess, the REJIS.  9       <b>Q   So from reading this report, it appears as</b>  10       <b>though you searched in Florida and Illinois for</b>  11       <b>Freddy, with a Y?</b>  12       A   I didn't search for Freddy with a Y.  13       <b>Q   All right. So I think I understand one of</b>  14       <b>the issues that we're having. And that is the fact</b>  15       <b>that the narrative that you're looking at on 45 is</b>  16       <b>slightly different than the narrative we're looking at</b>  17       <b>on 43. And if -- I'd call your attention to -- do you</b>  18       <b>see the paragraph that starts "Watson," Mr. Boyd?</b>  19       A   Yes.  20       <b>Q   You see how it's Freddy, F-r-e-d-d-y, on</b>  21       <b>page 43?</b>  22       A   Yes. That -- that doesn't match up what I  23       turned in.  24       <b>Q   Right. Okay. And this -- so this</b>  25       <b>mistake -- or this difference would have been somebody</b></p>
<p style="text-align: right;">Page 214</p> <p>1       charge.  2       <b>Q   Okay. You don't recall?</b>  3       A   Not at this time.  4       <b>Q   "It should be noted a REJIS computer search</b>  5       <b>of Freddy Watson" -- and that's Freddy with a Y,</b>  6       <b>F-r-e-d-d-y -- "revealed no record of an operator's</b>  7       <b>license through Florida, Illinois, or Missouri."</b>  8       <b>And how do you search REJIS through</b>  9       <b>different states? Could you explain to me how that</b>  10       <b>works?</b>  11       A   I don't recall.  12       <b>Q   But is my -- my understanding from reading</b>  13       <b>this is that you can do REJIS searches through</b>  14       <b>different states. Do you have to identify specific</b>  15       <b>states or is it just nationwide?</b>  16       A   I don't recall.  17       <b>Q   Okay. Why did -- why the states Florida,</b>  18       <b>Illinois, or Missouri?</b>  19       A   I mean, I don't recall why, but I'm assuming  20       it's because that's maybe what he told me, and  21       "Florida" up top.  22       <b>Q   And you don't -- you don't remember how the</b>  23       <b>REJIS system worked in terms of this state -- whether</b>  24       <b>you'd have to search nationwide or whether you had to</b>  25       <b>search state by state?</b></p>	<p style="text-align: right;">Page 216</p> <p>1       in reports -- the reports office who would have  2       written Freddy with a Y?  3       A   Whoever entered it.  4       <b>Q   It wouldn't have been you?</b>  5       A   No, mine says "Freddie."  6       <b>Q   Right. And you didn't type this?</b>  7       A   No. I didn't enter this incident/offense  8       report into the computer.  9       <b>Q   Understood. So I think it might be helpful</b>  10       <b>for us to do -- or I'm going to switch to doing what</b>  11       <b>you're doing, which is looking at page 45 because</b>  12       <b>that's -- that's the report you wrote; right?</b>  13       A   Yes.  14       <b>Q   Okay. So that report on 45, I'm at the</b>  15       <b>paragraph that starts "Watson". "Watson was</b>  16       <b>additional charged with making a false statement. It</b>  17       <b>should be noted a REJIS computer search of Fred Watson</b>  18       <b>revealed no record of an operator's license through</b>  19       <b>Florida, Illinois, or Missouri."</b>  20       <b>Does that reflect what you remember?</b>  21       A   Yes.  22       <b>Q   And it says, "A REJIS computer check of</b>  23       <b>Freddie Watson, revealed an expired operator's license</b>  24       <b>through Missouri that had not been surrendered to</b>  25       <b>another state."</b></p>

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<p style="text-align: right;">Page 217</p> <p>1 Does that reflect what you remember?</p> <p>2 A Yes.</p> <p>3 Q Do you know why you would have searched</p> <p>4 "Fred" for Florida, Illinois, or Missouri, but not</p> <p>5 "Freddie"?</p> <p>6 A Because he gave me Fred Watson initially.</p> <p>7 Q And then you went back and searched</p> <p>8 "Freddie"?</p> <p>9 A Searched "Freddie" where?</p> <p>10 Q Well, it says, "A REJIS computer check of</p> <p>11 Freddie Watson"?</p> <p>12 A I'm sorry. Okay. So you're asking me did I</p> <p>13 go back and search "Freddie" in Missouri or did I</p> <p>14 search him --</p> <p>15 Q Did you go -- did you ever search "Freddie"?</p> <p>16 A Yes.</p> <p>17 Q F-r-e-d-i-e?</p> <p>18 A Yes, yes, yes. That's how I came up with</p> <p>19 the expired operator's license in Missouri.</p> <p>20 Q And what searches did you conduct for</p> <p>21 "Freddie" -- for "Freddie"?</p> <p>22 A I went through REJIS.</p> <p>23 Q Through REJIS. And do you remember whether</p> <p>24 it was Missouri specifically, or whether it was</p> <p>25 specific states or whether it was nationwide?</p>	<p style="text-align: right;">Page 219</p> <p>1 document is this?</p> <p>2 A This is a complaint form.</p> <p>3 Q And when would you fill out a complaint</p> <p>4 form?</p> <p>5 A When there's a complaint that needs to be</p> <p>6 filled out for a crime that's been committed.</p> <p>7 Q And that's a non-traffic complaint; is that</p> <p>8 right?</p> <p>9 A Yes.</p> <p>10 Q Okay. Is this a -- would this be a</p> <p>11 duplicate or would there just be one copy of this?</p> <p>12 A This is just one copy you gave me.</p> <p>13 Q I mean, I -- I understand that this is</p> <p>14 clearly a photocopy of one -- and a document, but when</p> <p>15 you fill out these complaint forms, generally is it a</p> <p>16 yellow and a white sheet, or is it just one piece of</p> <p>17 paper?</p> <p>18 A No, it's a single sheet.</p> <p>19 Q A single sheet. And where did the -- the</p> <p>20 number for this is Cause Number 12-14370. Is that the</p> <p>21 number that you would have -- that would have been</p> <p>22 generated from dispatch?</p> <p>23 A The complaint number?</p> <p>24 Q Yes.</p> <p>25 A Yes.</p>
<p style="text-align: right;">Page 218</p> <p>1 A I don't recall.</p> <p>2 Q Do you recall receiving any information on</p> <p>3 that evening that showed that Mr. Watson lived in</p> <p>4 Illinois?</p> <p>5 A I don't recall.</p> <p>6 Q Do you recall receiving any information that</p> <p>7 Mr. Watson lived in Florida?</p> <p>8 A From where -- from Mr. Watson, yeah.</p> <p>9 Q From any other sources besides Mr. Watson?</p> <p>10 A I don't recall.</p> <p>11 Q Okay. And the last sentence says, "He was</p> <p>12 conveyed to the Ferguson Police Department where he</p> <p>13 was booked accordingly."</p> <p>14 Are we on 6?</p> <p>15 A Yes.</p> <p>16 (Exhibit 6, Complaint Form, was marked</p> <p>17 for identification.)</p> <p>18 MR. WALDRON: I'm going to mark this</p> <p>19 Exhibit 6, and this is WATSON_46 and 47.</p> <p>20 Sorry, Geri Lynn.</p> <p>21 Q (By Mr. Waldron) Mr. --</p> <p>22 MR. NORWOOD: What -- so what is the --</p> <p>23 you're marking it Number 6?</p> <p>24 MR. WALDRON: This is 6.</p> <p>25 Q (By Mr. Waldron) Mr. Boyd, what sort of a</p>	<p style="text-align: right;">Page 220</p> <p>1 Q Okay. And it's Freddie Watson, Defendant,</p> <p>2 115 Monteith address. And my apologies if I asked you</p> <p>3 this. Do you know where you got that address from?</p> <p>4 A The -- probably through REJIS, Department of</p> <p>5 Revenue.</p> <p>6 Q Through REJIS. Okay. And it says -- in the</p> <p>7 section where you write the complaint, is that your</p> <p>8 handwriting?</p> <p>9 A Yes.</p> <p>10 Q It says, "Fail to obey an officer -- Watson</p> <p>11 refused to provide pedigree information when asked."</p> <p>12 Is that correct as you remember it?</p> <p>13 A That's what it says.</p> <p>14 Q Is that a correct -- as you remember -- do</p> <p>15 you remember it?</p> <p>16 A It sounds -- that sounds right, yes.</p> <p>17 Q It sounds right. Okay.</p> <p>18 "Then refused to exit his vehicle when</p> <p>19 advised he was under arrest."</p> <p>20 Is that correct?</p> <p>21 A That sounds right.</p> <p>22 Q Which information -- which pedigree</p> <p>23 information did Mr. Watson refuse to provide?</p> <p>24 A At what point?</p> <p>25 Q Well, at the point that you've filed this</p>

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<p>1 A My auntie and my father.</p> <p>2 Q What's her name?</p> <p>3 A Audrey Lee.</p> <p>4 Q And where was she a police officer?</p> <p>5 A St. Louis City.</p> <p>6 Q And you said there was another person?</p> <p>7 A My father.</p> <p>8 Q And what's his name?</p> <p>9 A Eddie Boyd.</p> <p>10 Q As soon as it was coming out of my mouth, I</p> <p>11 knew. And where was he a police officer?</p> <p>12 A St. Louis City.</p> <p>13 Q Have you ever had an adult order of</p> <p>14 protection filed against you?</p> <p>15 MS. ARRINDELL: Objection. Relevance.</p> <p>16 A My ex-wife. I believe she tried to file</p> <p>17 one.</p> <p>18 Q (By Mr. Waldron) Did she file it?</p> <p>19 A She tried.</p> <p>20 Q Why do you say "tried" as opposed to she</p> <p>21 actually filed it?</p> <p>22 A They didn't allow it.</p> <p>23 Q Okay. So she -- your understanding is she</p> <p>24 went to the courthouse and attempted to file it, but</p> <p>25 she was not allowed to?</p>	<p>1 A No. I just -- I believe I just advised my</p> <p>2 supervisor.</p> <p>3 Q Who was your supervisor?</p> <p>4 A I don't recall.</p> <p>5 Q How did you advise him?</p> <p>6 A Verbally.</p> <p>7 Q You wouldn't have written it down?</p> <p>8 A I don't recall if I did or not.</p> <p>9 Q What was your first job in law enforcement?</p> <p>10 A Police officer.</p> <p>11 Q Where?</p> <p>12 A St. Louis City.</p> <p>13 Q St. Louis City. And what year would that</p> <p>14 have been?</p> <p>15 A 2002.</p> <p>16 Q And what was your first role, your first</p> <p>17 position at St. Louis City in 2002?</p> <p>18 A I'm not understanding the question.</p> <p>19 Q What was your title?</p> <p>20 A When I joined?</p> <p>21 Q Yes.</p> <p>22 A Police recruit in training.</p> <p>23 Q What other titles did you have?</p> <p>24 A Police recruiting in training.</p> <p>25 Q Okay. As you advanced through the</p>
Page 242	Page 244
<p>1 A It wasn't entered, as far as I know;</p> <p>2 so . . .</p> <p>3 Q Okay. Do you know what the reason for her</p> <p>4 filing it was?</p> <p>5 A I do not know.</p> <p>6 Q Okay. Where do you currently live?</p> <p>7 A St. Louis.</p> <p>8 Q What's your address? This is under -- we're</p> <p>9 under a protective order so what's said in this</p> <p>10 deposition is confidential.</p> <p>11 A I don't feel comfortable giving my address.</p> <p>12 I have some safety issues. I have protesters who are</p> <p>13 outside my door because I was a police officer, want</p> <p>14 to attack me and, you know, do harm to me and my</p> <p>15 family. And being that we're in an adverse situation</p> <p>16 right here, I don't feel comfortable giving my home</p> <p>17 address. You can have the station address. That's</p> <p>18 where I can get mail as well.</p> <p>19 Q And you said you've had protesters outside</p> <p>20 of your door before?</p> <p>21 A Yes. Sitting, watching, stalking,</p> <p>22 harassing.</p> <p>23 Q When was that?</p> <p>24 A 2014 to about 2015, 2016.</p> <p>25 Q Did you file a police report?</p>	<p>1 department.</p> <p>2 A Oh. Probationary police officer.</p> <p>3 Q When did -- when did you become a</p> <p>4 probationary police officer?</p> <p>5 A Upon graduating from the academy.</p> <p>6 Q Okay. Do you know what year that was?</p> <p>7 A 2003.</p> <p>8 Q Okay. How long were you a probationary</p> <p>9 police officer?</p> <p>10 A I don't recall.</p> <p>11 Q Did you have any titles before -- besides --</p> <p>12 or any subsequent to being a probationary police</p> <p>13 officer?</p> <p>14 A You mean after that?</p> <p>15 Q Yes.</p> <p>16 A A police officer.</p> <p>17 Q Police officer. And any titles besides</p> <p>18 police officer at SLMPD?</p> <p>19 A No.</p> <p>20 Q No?</p> <p>21 A None that I recall.</p> <p>22 Q Were you ever demoted?</p> <p>23 A Yes.</p> <p>24 Q And what were you demoted from?</p> <p>25 A Police officer.</p>

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EDDIE C. BOYD III 11/29/2018

Page 289	Page 291
<p>1 the termination?</p> <p>2 A I don't know. Is it on the form somewhere?</p> <p>3 Q Yeah. So look toward the top. It says,</p> <p>4 "Primary reason for termination." It says "check one</p> <p>5 box only."</p> <p>6 A Oh. It says "Personal."</p> <p>7 Q And what else?</p> <p>8 A Where else would it be?</p> <p>9 Q To the left. It looks like "Other</p> <p>10 employment" is checked; right?</p> <p>11 A Other -- I don't see it. "Other</p> <p>12 employment." Yeah, it says "Other employment" and</p> <p>13 "Personal."</p> <p>14 Q And you don't remember whether you actually</p> <p>15 had a job lined up or you just meant "some other job."</p> <p>16 Fair to say?</p> <p>17 MS. ARRINDELL: Objection. Mischaracterizes</p> <p>18 witness' testimony.</p> <p>19 Q (By Mr. Waldron) Well, did you have other</p> <p>20 employment at this time?</p> <p>21 MS. ARRINDELL: Objection. Asked and</p> <p>22 answered.</p> <p>23 A I don't recall.</p> <p>24 Q (By Mr. Waldron) You don't recall. And on</p> <p>25 top, it says "Employee Under Investigation." Then</p>	<p>1 investigation on this, an Internal Affairs</p> <p>2 investigation?</p> <p>3 A From your form you gave me, it says</p> <p>4 "IAD File."</p> <p>5 Q Do you ever know what happened to it?</p> <p>6 A No.</p> <p>7 Q Would you be surprised if you -- to find out</p> <p>8 that an allegation that -- that you -- another</p> <p>9 allegation against you had been sustained?</p> <p>10 MS. ARRINDELL: Objection. Calls for</p> <p>11 speculation.</p> <p>12 A Is that a question?</p> <p>13 Q (By Mr. Waldron) Yeah. Would you be --</p> <p>14 would you be surprised or are you surprised to hear</p> <p>15 this was -- that it was sustained?</p> <p>16 A I -- I -- I don't have an answer for that</p> <p>17 because, I mean, I don't know anything about it.</p> <p>18 Q You don't know anything about it; right?</p> <p>19 Okay. Have you ever -- what is Missouri POST?</p> <p>20 A Peace officer -- or police officers</p> <p>21 standardized -- or standard training.</p> <p>22 Q And what do they do?</p> <p>23 A Monitor training and police officer -- or</p> <p>24 peace officers' licenses.</p> <p>25 Q And had you ever -- have you ever had your</p>
Page 290	Page 292
<p>1 there's "No" and a "Yes" and the "Yes" is checked, and</p> <p>2 for Internal Affairs No. 7/106.</p> <p>3 Is it a coincidence that your last day</p> <p>4 physically on job, that's 4/26/07, was the same day</p> <p>5 that you filed this police report against Christopher</p> <p>6 Dickson?</p> <p>7 A I don't know. I mean, would it be a</p> <p>8 coincidence?</p> <p>9 Q I'm asking you if you remember any</p> <p>10 connection between the two things.</p> <p>11 A No, I don't.</p> <p>12 Q You remember nothing about those two things?</p> <p>13 A No.</p> <p>14 Q So it's pure happenstance that on one day,</p> <p>15 Christopher Dickson -- you filed these charges against</p> <p>16 Christopher Dickson where, in -- in your words, or in</p> <p>17 somebody's words, a hand goes and hits him in the</p> <p>18 face, and on the same day, that's your last day on the</p> <p>19 job?</p> <p>20 A I -- I mean, I don't know what you want me</p> <p>21 to say. But, I mean --</p> <p>22 Q If you don't remember, you don't remember.</p> <p>23 A I -- I mean, I don't recall if the</p> <p>24 circumstances is a coincidence.</p> <p>25 Q And do you remember whether there was an</p>	<p>1 license revoked by Missouri POST?</p> <p>2 A No. No.</p> <p>3 Q Have you ever had it investigated?</p> <p>4 A I believe there was an investigation.</p> <p>5 Q There was an investigation. Do you know</p> <p>6 what the result was of the investigation?</p> <p>7 A I believe everything was dropped.</p> <p>8 Q Everything was dropped. Do you know why it</p> <p>9 was dropped?</p> <p>10 A I don't recall at this time.</p> <p>11 Q So you remember that it was dropped, but you</p> <p>12 don't remember why it was dropped?</p> <p>13 MS. ARRINDELL: Objection to the extent it</p> <p>14 calls for waiver of attorney-client privilege and</p> <p>15 communication.</p> <p>16 A I don't recall.</p> <p>17 Q (By Mr. Waldron) Okay. So what years were</p> <p>18 you at St. Ann?</p> <p>19 A Approximately '07 to 2010.</p> <p>20 Q To -- I'm sorry, what year?</p> <p>21 A 2010.</p> <p>22 Q 2010. Okay. '07 to 2010 you were at</p> <p>23 St. Ann. And what was your duty or what was your --</p> <p>24 your position there?</p> <p>25 A Police officer.</p>

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ALARIS LITIGATION SERVICES

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Phone: 1.800.280.3376

Fax: 314.644.1334



Page 1 of 1

Requested by: #LAUCL1 ORI: MO095201J  
 Car ID: DESK LTERM: BFRGADVI  
 Date/Time of Inquiry: 12/05/2013 11:03 AM

\*\*\*\*\*  
 WANTED PERSON -- ACTIVE REF-NO: W08592616 MO0952800-FERGUSON PD  
 WATSON FREDDIE D B M 034 DOB:10081979 HGT:5-11 WT:175  
 BUILD:\_\_\_ COMP:\_\_\_ HAIR:XXX EYES:BRO PLACE-OF-BIRTH:\_\_\_ MAR-STA:\_\_\_  
 RESIDENCE: PO BOX 2003 12/05/2013  
 FAIRVIEW HTS IL 62208  
 MISC:FAIL TO OBEY PTA BOND 300  
 ADDITIONAL ID'S -----  
 SOC SEC NO: [REDACTED]  
 OPR LIC NO:G208010016 MO 2005  
 CHARGES . . . . . EXT . . WAR/OCA . . . . . DATE . CHG-CODE  
 CTY WAR FAIL TO APPEAR ORDINANCE P WAR:FGT137596 10292013 76151150  
 RMK EXT 50 MILES OCA:13-7596  
 OOC:91226990 - FAIL TO OBEY POLICE OFCR CORI:MO095201J  
 EXT DESC: P = PARTIAL INTRASTATE  
 -----  
 EN:12-05-2013 11:03 #LAUCL1 UP:\_\_\_\_\_  
 LC:\_\_\_\_\_ CN:\_\_\_\_\_  
 4049 SUPPLEMENTAL DATA ENTERED - MULES ONLY  
 MULES SHP:131205-110343 NOTIFY-ORI: -  
 \*\*\*\*\*



Response

Page 1 of 1



Requested by: #LAUCL1 ORI: MO095201J  
 Car ID: DESK LTERM: BFRGADVI  
 Date/Time of Inquiry: 12/05/2013 11:03 AM  
 START OF DOR RESPONSE PHOTO

NAME: WATSON, FREDDIE D  
 OLN: G208010016 SEX: M  
 PHOTO TAKEN: 10-11-2002  
 DOC TYPE: DRIVERS LICENSE SEQ: 021372840002



12/05/2013 11:02	START OF DOR RESPONSE	DRIVERS HISTORY
DESK G208010016	DEPARTMENT OF REVENUE	FULL RESPONSE

\*\*\*\*\*  
 \* THIS RECORD RESTRICTED UNDER THE FEDERAL DRIVER'S PRIVACY PROTECTION ACT \*  
 \*\*\*\*\*

LIC: G208010016  
 NAME: WATSON, FREDDIE D SSN: [REDACTED]  
 SEX: MALE AGE: 034 DOB: 10/08/1979 HGT: 5-11 WGT: 175 EYES: BROWN  
 RESIDENT ADDRESS CURRENT ADDRESS  
 115 MONTEITH PO BOX 2003  
 ST LOUIS, MO 63137 FAIRVIEW HTS, IL 62208-0203  
 PREV NAME: WATSON, FREDDIE D  
 -----<<<< LICENSE >>>-----  
 STATUS MO: VALID EXPIRED  
 SURRENDERED TO:  
 CLASS: F-NON-COMMERCIAL SEQ: 021372840002  
 EXP: 10/08/2005 L-UPD: 11/04/2002  
 -----<<<< PERMIT >>>-----  
 CLASS: F-NON-COMMERCIAL SEQ: 962080459010  
 EXP: 08/17/1996 L-UPD: 02/27/1996  
 -----<<<< ID CARD >>>-----  
 EXP: 08/19/2001 SEQ: 982082310248 L-UPD: 09/16/1998  
 -----<<<< CONVICTION / ACTIONS >>>-----  
 05/23/2013 PTS:02 SPEEDING  
 VIOL: 04/30/2013 CONVICTED: 05/17/2013 UTT: 120522300  
 CIR CRT MUN DIV NORTHWOODS

END OF DOR RESPONSE



Response

Page 1 of 1

Requested by: #HAYJM1 ORI: M00952800  
 Car ID: DESK LTERM: LFRGA AVI  
 Date/Time of Inquiry: 08/01/2012 21:05 PM  
 START OF DOR RESPONSE PHOTO

NAME: WATSON, FREDDIE D  
 OLN: G208010016 SEX: M  
 PHOTO TAKEN: 10-11-2002  
 DOC TYPE: DRIVERS LICENSE SEQ: 021372840002



08/01/2012 09:04	START OF DOR RESPONSE	
DESK WATSON FREDDIE	DEPARTMENT OF REVENUE	DRIVERS HISTORY
	19791008M	FULL RESPONSE

\*\*\*\*\*  
 \* THIS RECORD RESTRICTED UNDER THE FEDERAL DRIVER'S PRIVACY PROTECTION ACT \*  
 \*\*\*\*\*

LIC: G208010016  
 NAME: WATSON, FREDDIE D SSN: [REDACTED]  
 SEX: MALE AGE: 032 DOB: 10/08/1979 HGT: 5-11 WGT: 175 EYES: BROWN  
 RESIDENT ADDRESS CURRENT ADDRESS  
 115 MONTEITH PO BOX 2003  
 ST LOUIS, MO 63137 FAIRVIEW HTS, IL 62208-0203  
 PREV NAME: WATSON, FREDDIE D  
 -----<<<< LICENSE >>>>-----  
 STATUS MO: VALID EXPIRED  
 SURRENDERED TO:  
 CLASS: F-NON-COMMERCIAL SEQ: 021372840002  
 EXP: 10/08/2005 L-UPD: 11/04/2002  
 -----<<<< PERMIT >>>>-----  
 CLASS: F-NON-COMMERCIAL SEQ: 962080459010  
 EXP: 08/17/1996 L-UPD: 02/27/1996  
 -----<<<< ID CARD >>>>-----  
 EXP: 08/19/2001 SEQ: 982082310248 L-UPD: 09/16/1998  
 END OF DOR RESPONSE

Response

Page 1 of 2

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 \*\*\* START OF REJIS HOT FILE RESPONSE \*\*\*
 

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CADR\*\*\* FOR /LIC 958MRJ FL 2012 PC - NO RECORD REJIS

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 \*\*\* END OF REJIS HOT FILE RESPONSE \*\*\*
 

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 START OF MULES HOT FILE RESPONSE
 

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 FROM-MULES/3 DATE: 08/01/2012 TIME: 21:46:35 DEST TERM: LFRGAIVI  
 QW.ORI/MO0952800.LIC/958MRJ .LIS/FL.LIY/12.LIT/PC  
 \* NO MULES WANT OR WARRANT  
 \* \* INQUIRY HAS BEEN SENT TO NLETS \* \*  


---

 END OF MULES HOT FILE RESPONSE
 

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 START OF NCIC HOT FILE RESPONSE
 

---

 FROM-NCIC DATE: 08/01/2012 TIME: 21:46:35 DEST TERM: LFRGAIVI  
 QW.MO0952800.LIC/958MRJ.LIS/FL
 

---

MO0952800

 =====  
 NO NCIC WANT LIC/958MRJ LIS/FL  
 \*\*\*MESSAGE KEY QW SEARCHES WANTED PERSON FILE FELONY RECORDS REGARDLESS OF  
 EXTRADITION AND MISDEMEANOR RECORDS INDICATING POSSIBLE INTERSTATE  
 EXTRADITION FROM THE INQUIRING AGENCY'S LOCATION. ALL OTHER NCIC PERSONS  
 FILES ARE SEARCHED WITHOUT LIMITATIONS.  


---

 END OF NCIC HOT FILE RESPONSE
 

---



---

 START OF NLETS VEHICLE REGIST
 

---

 FROM-NLETS DATE: 08/01/2012 TIME: 21:46:38 DEST TERM: LFRGAIVI  
 RQ.MO0952800.FL.\*0SEIP00000.TXT LIC/958MRJ.LIY/2012.LIT/PC
 

---

 RR.FL037065V  
 19:46 08/01/2012 34118  
 19:46 08/01/2012 22869 MO0952800  
 \*7554615900  
 TXT  
 --DMVR--  
 DHSMV RECORD -  
 958MRJ 1G4GE5EDXBF279655 BUIC 4D 11 004077 ORIGINAL - NEW  
 COLOR: BLK  
 FREDDIE DEMON WATSON
 

---

 PO BOX 2003 CLASS: 001 GVW: 000000  
 FAIRVIEW HTS IL 62208-0203 COUNTY RES: 09  
 DOB: 10/08/79 SEX: M DECAL/YR: 14763257/2 DECAL EXP:10/08/12 USE: PRIVATE
 

---

 REGISTRANT(S) INFORMATION  
 REGISTRANT 1: FREDDIE DEMON WATSON  
 PO BOX 2003 SEX: M DOB: 10/08/79
 

---

Response

Page 2 of 2

FAIRVIEW HTS  
REGISTRANT 2:

IL 62208-0203 DL#1: W325244793680

SEX: DOB: / /  
NO R2

INSURANCE INFORMATION

INSURER: GOVERNMENT EMPLOYEES INS. CO.

POLICY # 4038680916


5260 WESTERN AVENUE  
CHEVY CHASE

MD 20815-0000

END DHSMV RESPONSE

END OF NLETS VEHICLE REGIST



 <b>ORI NO. MO 0952800</b> <b>CITY OF FERGUSON</b> UNIFORM CITATION		Proof of financial responsibility <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <b>111 787144</b>	
STATE OF MISSOURI		DIVISION	
IN THE CIRCUIT COURT OF <b>ST. LOUIS</b>		COUNTY <b>MUNICIPAL</b>	
COURT ADDRESS (STREET, CITY, ZIP) <b>110 CHURCH ST. FERGUSON, MO 63135 14370</b>			
COURT DATE - COURT TIME <b>9/25/12 10:00 AM</b>		COURT PHONE NO <b>(314) 524-5264</b>	
I, KNOWING THAT FALSE STATEMENTS ON THIS FORM ARE PUNISHABLE BY LAW, STATE THAT I HAVE PROBABLE CAUSE TO BELIEVE THAT:			
ON/ABOUT (DATE)	AT TIME	HWY CLASS	UPON/AT OR NEAR (LOCATION)
<b>8/1/12</b>	<b>2017 HRS</b>		<b>225 Ferguson</b>
WITHIN CITY/COUNTY AND STATE AFORESAID,			
NAME (LAST, FIRST, MIDDLE) <b>Watson, Freddie D</b>			
STREET ADDRESS <b>115 Brighton</b>			
CITY <b>St. Louis</b>		STATE <b>MO</b>	ZIP CODE <b>63137</b>
DATE OF BIRTH <b>10/11/79</b>	AGE <b>32</b>	RACE <b>P.</b>	SEX <b>M</b>
DRIVER'S LIC NO. <b>6208010516</b>		CDL <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	WEIGHT <b>175</b>
<b>LEAVE THIS LINE BLANK</b>			
EMPLOYER			
ADDRESS (STREET, CITY, STATE, ZIP)			
DID UNLAWFULLY <input checked="" type="checkbox"/> OPERATE/DRIVE <input type="checkbox"/> PARK <input type="checkbox"/> C.M.V. <input type="checkbox"/> WITH HAZ MAT			
VEHICLE	YEAR	MAKE	MODEL
	<b>2011</b>	<b>Ford</b>	<b>Ford</b>
REGISTERED WEIGHT	LIC	NUMBER	STATE
		<b>958MRT</b>	<b>FL</b>
COLOR	YEAR		
<b>BLK</b>	<b>2012</b>		
DID THEN AND THERE COMMIT THE FOLLOWING OFFENSE. THE FACTS SUPPORTING THIS BELIEF ARE AS FOLLOWS: <b>No operators license in possession</b>			
<input type="checkbox"/> Subject taken into custody. (Complete "For Issuance of a Warrant" section on reverse side.)			
DRIVING	POSTED SPEED LIMIT	DETECTION METHOD	
MPH	MPH	<input type="checkbox"/> STATIONARY RADAR <input type="checkbox"/> WATCH (AIR) <input type="checkbox"/> PACE <input type="checkbox"/> MOVING RADAR <input type="checkbox"/> WATCH (GROUND) <input type="checkbox"/> OTHER	
IN VIOLATION OF		CHARGE CODE	<input type="checkbox"/> IN FATAL ACCIDENT
<input type="checkbox"/> RSMo <input checked="" type="checkbox"/> ORD		CHARGE CODE	<input type="checkbox"/> IN ACCIDENT
SEAT BELT VIOLATION <input type="checkbox"/> ORD <input type="checkbox"/> RSMo		<input type="checkbox"/> DWI/BAC	
OFFICER	BADGE	TRP/ZONE	DATE
<b>1111</b>			<b>8/1/12</b>
ON INFORMATION UNDERSIGNED PROSECUTOR CHARGES THE DEFENDANT AND INFORMS THE COURT THAT ABOVE FACTS ARE TRUE AND PUNISHABLE BY <input type="checkbox"/> RSMo <input type="checkbox"/> ORD			
PROSECUTOR'S SIGNATURE			DATE
I PROMISE TO DISPOSE OF THE CHARGES OF WHICH I AM ACCUSED THROUGH COURT APPEARANCE OR PREPAYMENT OF FINE AND COURT COSTS SIGNATURE <b>X Booked</b>			DR LIC POSTED <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO

MO 100-0051 (10-02)

WATSON\_00001

VIOLATOR'S COPY

**PLAINTIFF'S  
EXHIBIT**

tabbies

4




ORI NO. MO 0952800		Proof of financial responsibility <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	
CITY OF FERGUSON		111 787145	
(w) UNIFORM CITATION			
STATE OF MISSOURI		DIVISION	
IN THE CIRCUIT COURT OF ST. LOUIS		COUNTY MUNICIPAL	
COURT ADDRESS (STREET, CITY, ZIP)			
110 CHURCH ST.		FERGUSON, MO 63135 14370	
COURT DATE - COURT TIME		COURT PHONE NO	
9/25/12 10:00 AM		(314) 524-5264	
I, KNOWING THAT FALSE STATEMENTS ON THIS FORM ARE PUNISHABLE BY LAW, STATE THAT I HAVE PROBABLE CAUSE TO BELIEVE THAT:			
ON/ABOUT (DATE)	AT TIME	HWY CLASS	UPON/AT OR NEAR (LOCATION)
9/11/12	2:07 HRS		825 Ferguson
WITHIN CITY/COUNTY AND STATE AFORESAID,			
NAME (LAST, FIRST, MIDDLE)			
Watson, Freddie D			
STREET ADDRESS			
115 Melrose			
CITY		STATE	ZIP CODE
St Louis		MO	63137
DATE OF BIRTH	AGE	RACE	SEX
10/21/79	32	B	M
DRIVER'S LIC. NO.	CDL	STATE	
Q 208010016	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	MO	
LEAVE THIS LINE BLANK			
EMPLOYER			
ADDRESS (STREET, CITY, STATE, ZIP)			
DID UNLAWFULLY <input checked="" type="checkbox"/> OPERATE/DRIVE <input type="checkbox"/> PARK <input type="checkbox"/> C.M.V. <input type="checkbox"/> WITH HAZ MAT			
VEHICLE	YEAR	MAKE	MODEL
	2011	BUICK	SAFARI
REGISTERED WEIGHT	LIC	NUMBER	STATE
		958 MRT	FL
YEAR	COLOR		
2013	BLK		
DID THEN AND THERE COMMIT THE FOLLOWING OFFENSE. THE FACTS SUPPORTING THIS BELIEF ARE AS FOLLOWS:			
No proof of insurance			
<input checked="" type="checkbox"/> Subject taken into custody. (Complete "For Issuance of a Warrant" section on reverse side.)			
DRIVING	POSTED SPEED LIMIT	DETECTION METHOD	
MPH	MPH	<input type="checkbox"/> STATIONARY RADAR <input type="checkbox"/> WATCH (AIR) <input type="checkbox"/> PACE	
IN VIOLATION OF		<input type="checkbox"/> MOVING RADAR <input type="checkbox"/> WATCH (GROUND) <input type="checkbox"/> OTHER	
<input type="checkbox"/> RSMo <input checked="" type="checkbox"/> ORD		CHARGE CODE	
SEAT BELT VIOLATION <input type="checkbox"/> ORD <input type="checkbox"/> RSMo		CHARGE CODE	
OFFICER		BADGE	TRP/ZONE
Apl			
ON INFORMATION UNDERSIGNED PROSECUTOR CHARGES THE DEFENDANT AND INFORMS THE COURT THAT ABOVE FACTS ARE TRUE AND PUNISHABLE BY		DATE	
		8/11/12	
PROSECUTOR'S SIGNATURE		DATE	
I PROMISE TO DISPOSE OF THE CHARGES OF WHICH I AM ACCUSED THROUGH COURT APPEARANCE OR PREPAYMENT OF FINE AND COURT COSTS		DR LIC POSTED	
SIGNATURE X Booked		<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	

MO 100-0051 (10-02)

WATSON\_00003

VIOLATOR'S COPY



 <b>ORI NO. MO 0952800</b> <b>CITY OF FERGUSON</b> (101) <b>UNIFORM CITATION</b>		Proof of financial responsibility <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <b>111 787146</b>	
STATE OF MISSOURI		DIVISION	
IN THE CIRCUIT COURT OF <b>ST. LOUIS</b>		COUNTY <b>MUNICIPAL</b>	
COURT ADDRESS (STREET, CITY, ZIP) <b>110 CHURCH ST. FERGUSON, MO 63135 14370</b>			
COURT DATE - COURT TIME <b>4/25/12</b>		COURT PHONE NO <b>(314) 524-5264</b>	
I, KNOWING THAT FALSE STATEMENTS ON THIS FORM ARE PUNISHABLE BY LAW, STATE THAT I HAVE PROBABLE CAUSE TO BELIEVE THAT:			
ON/ABOUT (DATE)	AT TIME	HWY CLASS	UPON/AT OR NEAR (LOCATION)
<b>2/1/12</b>	<b>2:47</b> HRS		<b>225 Ferguson</b>
WITHIN CITY/COUNTY AND STATE AFORESAID.			
NAME (LAST, FIRST, MIDDLE) <b>Watson, Freddie D</b>			
STREET ADDRESS <b>115 Monticello</b>			
CITY <b>St. Louis</b>		STATE <b>MO</b>	ZIP CODE <b>63137</b>
DATE OF BIRTH <b>10/8/79</b>	AGE <b>32</b>	RACE <b>P</b>	SEX <b>M</b>
DRIVER'S LIC NO <b>6208010014</b>		CDL <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	STATE <b>MO</b>
<b>LEAVE THIS LINE BLANK</b>			
EMPLOYER			
ADDRESS (STREET, CITY, STATE, ZIP)			
DID UNLAWFULLY <input checked="" type="checkbox"/> OPERATE/DRIVE <input type="checkbox"/> PARK <input type="checkbox"/> C.M.V. <input type="checkbox"/> WITH HAZ MAT			
VEHICLE	YEAR	MAKE	MODEL
	<b>2011</b>	<b>Pontiac</b>	<b>Sedan</b>
REGISTERED WEIGHT	LIC	NUMBER	STATE
		<b>958 MRT</b>	<b>FL</b>
YEAR			
			<b>2012</b>
DID THEN AND THERE COMMIT THE FOLLOWING OFFENSE. THE FACTS SUPPORTING THIS BELIEF ARE AS FOLLOWS:			
<b>Vision reducing material applied to windshield</b>			
<input checked="" type="checkbox"/> Subject taken into custody. (Complete "For Issuance of a Warrant" section on reverse side.)			
DRIVING	POSTED SPEED LIMIT	DETECTION METHOD	
MPH	MPH	<input type="checkbox"/> STATIONARY RADAR <input type="checkbox"/> WATCH (AIR) <input type="checkbox"/> FACE <input type="checkbox"/> MOVING RADAR <input type="checkbox"/> WATCH (GROUND) <input type="checkbox"/> OTHER	
IN VIOLATION OF	<input type="checkbox"/> RSMo <input type="checkbox"/> ORD	CHARGE CODE	<input type="checkbox"/> IN FATAL ACCIDENT
SEAT BELT VIOLATION	<input type="checkbox"/> ORD <input type="checkbox"/> RSMo	CHARGE CODE	<input type="checkbox"/> IN ACCIDENT
OFFICER	BADGE	TRP/ZONE	DATE
<b>Apf</b>			<b>2/1/12</b>
ON INFORMATION UNDERSIGNED PROSECUTOR CHARGES THE DEFENDANT AND INFORMS THE COURT THAT ABOVE FACTS ARE TRUE AND PUNISHABLE BY <input type="checkbox"/> RSMo <input type="checkbox"/> ORD			
PROSECUTOR'S SIGNATURE			DATE
I PROMISE TO DISPOSE OF THE CHARGES OF WHICH I AM ACCUSED THROUGH COURT APPEARANCE, OR PREPAYMENT OF FINE AND COURT COSTS			DR. LIC POSTED
SIGNATURE <b>X</b> <b>Looked</b>			<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO

MO 100-0051 (10-02)

**WATSON\_00004**

VIOLATOR'S COPY




VIOLATOR'S COPY

MO 100-0051 (10-02)

SIGNATURE <input checked="" type="checkbox"/> <i>WATSON</i> I PROMISE TO DISPOSE OF THE CHARGES OF WHICH I AM ACCUSED THROUGH COURT APPEARANCE OR PREPAYMENT OF FINE AND COURT COSTS OR LIC POSTED <input type="checkbox"/> YES <input type="checkbox"/> NO	
PROSECUTOR'S SIGNATURE	
DATE	
ON INFORMATION UNDERSIGNED PROSECUTOR CHARGES THE DEFENDANT AND INFORMS THE COURT THAT ABOVE FACTS ARE TRUE AND PUNISHABLE BY	
<input type="checkbox"/> RSMO <input type="checkbox"/> ORD <input type="checkbox"/> ORD	
OFFICER	DATE
VIOLATION OF <input type="checkbox"/> RSMO <input type="checkbox"/> ORD SEAT BELT <input type="checkbox"/> ORD VIOLATION <input type="checkbox"/> RSMO <input type="checkbox"/> ORD	CHARGE CODE CHARGE CODE CHARGE CODE
IN VIOLATION OF <input type="checkbox"/> RSMO <input type="checkbox"/> ORD SEAT BELT <input type="checkbox"/> ORD VIOLATION <input type="checkbox"/> RSMO <input type="checkbox"/> ORD	CHARGE CODE CHARGE CODE CHARGE CODE
DRIVING <input type="checkbox"/> RSMO <input type="checkbox"/> ORD POSTED SPEED LIMIT <input type="checkbox"/> RSMO <input type="checkbox"/> ORD MPM <input type="checkbox"/> RSMO <input type="checkbox"/> ORD	DETECTION METHOD MOVING RADAR <input type="checkbox"/> WATCH (GROUND) <input type="checkbox"/> OTHER STATIONARY RADAR <input type="checkbox"/> WATCH (AIR) <input type="checkbox"/> FACE
<input checked="" type="checkbox"/> Subject taken into custody. (Complete For Issuance of a Warrant section on reverse side.)	
DID THEN AND THERE COMMIT THE FOLLOWING OFFENSE. THE FACTS SUPPORTING THIS BELIEF ARE AS FOLLOWS: <i>Subject is a state operator</i> <i>License</i>	
DID UNLAWFULLY <input type="checkbox"/> OPERATE/DRIVE <input type="checkbox"/> PARK <input type="checkbox"/> C.M.V. <input type="checkbox"/> WITH HAZ MAT	YEAR MAKE MODEL STYLE COLOR 2011 Buick Regal Silver Black
REGISTERED WEIGHT YEAR MAKE MODEL STYLE COLOR	YEAR MAKE MODEL STYLE COLOR 2011 Buick Regal Silver Black
ADDRESS (STREET CITY STATE ZIP)	
EMPLOYER	
LEAVE THIS LINE BLANK	
DRIVER'S LIC. NO. <i>920800016</i> DATE OF BIRTH <i>11/19/79</i> AGE <i>42</i> RACE <i>B</i> SEX <i>M</i> HEIGHT <i>5'11"</i> WEIGHT <i>175</i> STATE <i>MO</i>	CITY <i>St. Louis</i> STATE <i>MO</i> ZIP CODE <i>63137</i>
STREET ADDRESS <i>110 Church St.</i> NAME (LAST FIRST MIDDLE) <i>Watson, Freddie D</i>	
WITHIN CITY/COUNTY AND STATE AFORESAID.	
ON/ABOUT (DATE) AT TIME <i>11/19/21 6:00 PM</i> HWY CLASS <i>1</i> UPON/AT OR NEAR (LOCATION) <i>110 Church St.</i>	I, KNOWING THAT FALSE STATEMENTS ON THIS FORM ARE PUNISHABLE BY LAW, STATE THAT I HAVE PROBABLE CAUSE TO BELIEVE THAT:
COURT DATE - COURT TIME <i>11/23/21 10:00 AM</i> COURT PHONE NO. <i>(314) 524-5264</i>	COURT ADDRESS (STREET CITY ZIP) <i>110 Church St. Ferguson, MO 63135</i>
IN THE CIRCUIT COURT OF <i>ST. LOUIS</i> DIVISION <i>MUNICIPAL</i>	STATE OF MISSOURI
CITY OF FERGUSON ORI NO. MO 0952800 UNIFORM CITATION	
111 787150	
Proof of financial responsibility <input type="checkbox"/> YES <input type="checkbox"/> NO	

WATSON\_00005




 <b>ORI NO. MO 0952800</b> <b>CITY OF FERGUSON</b> UNIFORM CITATION		Proof of financial responsibility <input type="checkbox"/> YES <input type="checkbox"/> NO <b>111 787149</b>	
STATE OF MISSOURI		DIVISION	
IN THE CIRCUIT COURT OF <b>ST. LOUIS</b>		COUNTY <b>MUNICIPAL</b>	
COURT ADDRESS (STREET, CITY, ZIP) <b>110 CHURCH ST. FERGUSON, MO 63135 14370</b>			
COURT DATE - COURT TIME <b>9/25/12</b>		COURT PHONE NO <b>(314) 524-5264</b>	
I, KNOWING THAT FALSE STATEMENTS ON THIS FORM ARE PUNISHABLE BY LAW, STATE THAT I HAVE PROBABLE CAUSE TO BELIEVE THAT:			
ON/ABOUT (DATE)	AT TIME	HWY CLASS	UPON/AT OR NEAR (LOCATION)
<b>8/1/12</b>	<b>2:17</b> HRS		<b>825 Ferguson</b>
WITHIN CITY/COUNTY AND STATE AFORESAID.			
NAME (LAST, FIRST, MIDDLE) <b>Watson, Freddie D</b>			
STREET ADDRESS <b>115 11th St</b>			
CITY <b>St Louis</b>		STATE <b>MO</b>	ZIP CODE <b>63137</b>
DATE OF BIRTH <b>10/21/79</b>	AGE <b>32</b>	RACE <b>P</b>	SEX <b>M</b>
DRIVER'S LIC NO. <b>208019016</b>		CDL <input type="checkbox"/> YES <input type="checkbox"/> NO	STATE <b>MO</b>
<b>LEAVE THIS LINE BLANK</b>			
EMPLOYER			
ADDRESS (STREET, CITY, STATE, ZIP)			
DID UNLAWFULLY <input checked="" type="checkbox"/> OPERATE/DRIVE <input type="checkbox"/> PARK <input type="checkbox"/> C.M.V. <input type="checkbox"/> WITH HAZ MAT			
V E H I C L E	YEAR <b>2011</b>	MAKE <b>Buick</b>	MODEL <b>Sedan</b>
	REGISTERED WEIGHT	NUMBER <b>958MKT</b>	STYLE <b>4dr</b>
			COLOR <b>BLK</b>
DID THEN AND THERE COMMIT THE FOLLOWING OFFENSE. THE FACTS SUPPORTING THIS BELIEF ARE AS FOLLOWS: <b>NO seat belt</b>			
<input checked="" type="checkbox"/> Subject taken into custody. (Complete "For Issuance of a Warrant" section on reverse side.)			
DRIVING	POSTED SPEED LIMIT MPH	DETECTION METHOD <input type="checkbox"/> STATIONARY RADAR <input type="checkbox"/> WATCH (AIR) <input type="checkbox"/> PACE <input type="checkbox"/> MOVING RADAR <input type="checkbox"/> WATCH (GROUND) <input type="checkbox"/> OTHER	
IN VIOLATION OF	<input type="checkbox"/> RSMo <input checked="" type="checkbox"/> ORD	CHARGE CODE	<input type="checkbox"/> IN FATAL ACCIDENT <input type="checkbox"/> IN ACCIDENT <input type="checkbox"/> DWI/BAC
SEAT BELT VIOLATION	<input type="checkbox"/> ORD <input type="checkbox"/> RSMo	CHARGE CODE	
OFFICER <b>AP</b>	BADGE <b>111</b>	TRIP ZONE	DATE <b>8/1/12</b>
ON INFORMATION, UNDERSIGNED PROSECUTOR CHARGES THE DEFENDANT AND INFORMS THE COURT THAT ABOVE FACTS ARE TRUE AND PUNISHABLE BY <input type="checkbox"/> RSMo <input type="checkbox"/> ORD			
PROSECUTOR'S SIGNATURE		DATE	
I PROMISE TO DISPOSE OF THE CHARGES OF WHICH I AM ACCUSED THROUGH COURT APPEARANCE OR PREPAYMENT OF FINE AND COURT COSTS SIGNATURE <b>X</b> <b>Booker</b>		DR. LIC POSTED <input type="checkbox"/> YES <input type="checkbox"/> NO	

MO 100-0051 (10-02)

WATSON\_00006

VIOLATOR'S COPY

 <b>ORI NO. MO 0952800</b> <b>CITY OF FERGUSON</b> (10) <b>UNIFORM CITATION</b>		Proof of financial responsibility <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <b>111 787147</b>	
STATE OF MISSOURI		DIVISION	
IN THE CIRCUIT COURT OF <b>ST. LOUIS</b>		COUNTY <b>MUNICIPAL</b>	
COURT ADDRESS (STREET, CITY, ZIP) <b>110 CHURCH ST. FERGUSON, MO 63135 14370</b>			
COURT DATE - COURT TIME <b>9/25/12</b>		COURT PHONE NO <b>(314) 524-5264</b>	
10:00 <input checked="" type="checkbox"/> AM 6:00 <input type="checkbox"/> PM			
I, KNOWING THAT FALSE STATEMENTS ON THIS FORM ARE PUNISHABLE BY LAW, STATE THAT I HAVE PROBABLE CAUSE TO BELIEVE THAT:			
ON/ABOUT (DATE)	AT TIME	HWY CLASS	UPON/AT OR NEAR (LOCATION)
<b>8/11/12</b>	<b>2:07</b> HRS		<b>825 Ferguson</b>
WITHIN CITY/COUNTY AND STATE AFORESAID.			
NAME (LAST, FIRST, MIDDLE) <b>Watson, Freddie D</b>			
STREET ADDRESS <b>115 Mantelth</b>			
CITY <b>St. Louis</b>		STATE <b>MO</b>	ZIP CODE <b>63137</b>
DATE OF BIRTH <b>10/1/79</b>	AGE <b>32</b>	RACE <b>R</b>	SEX <b>M</b>
HEIGHT <b>5'11"</b>	WEIGHT <b>175</b>		
DRIVER'S LIC. NO. <b>6208010016</b>		CDL <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	STATE <b>MO</b>
<b>LEAVE THIS LINE BLANK</b>			
EMPLOYER			
ADDRESS (STREET, CITY, STATE, ZIP)			
<b>DID UNLAWFULLY</b> <input type="checkbox"/> OPERATE/DRIVE <input type="checkbox"/> PARK <input type="checkbox"/> C.M.V. <input type="checkbox"/> WITH HAZ MAT			
V E H I C L E	YEAR <b>2011</b>	MAKE <b>Dodge</b>	MODEL <b>Charger</b>
	STYLE <b>4dr</b>	COLOR <b>Blk</b>	
	REGISTERED WEIGHT	LIC. NUMBER <b>958MKT</b>	STATE <b>IL</b>
		YEAR <b>2012</b>	
DID THEN AND THERE COMMIT THE FOLLOWING OFFENSE. THE FACTS SUPPORTING THIS BELIEF ARE AS FOLLOWS: <b>Failed to register car of state not within 30 days</b>			
<input checked="" type="checkbox"/> Subject taken into custody. (Complete "For Issuance of a Warrant" section on reverse side.)			
DRIVING	POSTED SPEED LIMIT MPH	DETECTION METHOD <input type="checkbox"/> STATIONARY RADAR <input type="checkbox"/> WATCH (AIR) <input type="checkbox"/> PACE <input type="checkbox"/> MOVING RADAR <input type="checkbox"/> WATCH (GROUND) <input type="checkbox"/> OTHER	
IN VIOLATION OF	<input type="checkbox"/> RSMo <input checked="" type="checkbox"/> ORD	CHARGE CODE	<input type="checkbox"/> IN FATAL ACCIDENT <input type="checkbox"/> IN ACCIDENT <input type="checkbox"/> DWI/BAC
SEAT BELT VIOLATION	<input type="checkbox"/> ORD <input type="checkbox"/> RSMo	CHARGE CODE	
OFFICER <b>111</b>	BADGE <b>100</b>	TRIP ZONE	DATE <b>8/1/12</b>
ON INFORMATION, UNDERSIGNED PROSECUTOR CHARGES THE DEFENDANT AND INFORMS THE COURT THAT ABOVE FACTS ARE TRUE AND PUNISHABLE BY <input type="checkbox"/> RSMo <input type="checkbox"/> ORD			
PROSECUTOR'S SIGNATURE			DATE
I PROMISE TO DISPOSE OF THE CHARGES OF WHICH I AM ACCUSED THROUGH COURT APPEARANCE OR PREPAYMENT OF FINE AND COURT COSTS			DR. LIC. POSTED <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
SIGNATURE <b>X</b> <b>Looked</b>			

MO 100-0051 (10-02)

WATSON\_00007

VIOLATOR'S COPY



## VIOLATOR'S COPY

ORI NO. MO 0952800		CITY OF FERGUSON		UNIFORM CITATION		111 787148	
STATE OF MISSOURI		ST. LOUIS		DIVISION		MUNICIPAL	
COURT ADDRESS (STREET, CITY, ZIP)		110 CHURCH ST.		FERGUSON, MO 63135		14370	
COURT DATE - COURT TIME		10:00 AM		COURT PHONE NO		(314) 524-5264	
I, KNOWING THAT FALSE STATEMENTS ON THIS FORM ARE PUNISHABLE BY LAW, STATE THAT I HAVE PROBABLE CAUSE TO BELIEVE THAT:		ON/ABOUT (DATE) AT TIME		HRS		2:45 PM	
WITHIN CITY/COUNTY AND STATE AFORESAID,		NAME (LAST FIRST MIDDLE)		STREET ADDRESS		CITY	
DATE OF BIRTH		AGE		FACE		SEX	
HEIGHT		WEIGHT		CDL		STATE	
DRIVER'S LIC NO.		YES		NO		CDL	
LEAVE THIS LINE BLANK		EMPLOYER		ADDRESS (STREET CITY STATE ZIP)		DID UNLAWFULLY	
DID THEN AND THERE COMMIT THE FOLLOWING OFFENSE, THE FACTS SUPPORTING THIS BELIEF ARE AS FOLLOWS:		YEAR		MAKE		MODEL	
YEAR		COLOR		STYLE		C.M.V.	
DID UNLAWFULLY		OPERATE/DRIVE		PARK		WITH HAZ MAT	
DRIVING		POSTED SPEED LIMIT		DETECTION METHOD		PACE	
IN VIOLATION OF		RSMo		CHARGE CODE		IN FATAL ACCIDENT	
SEAT BELT VIOLATION		ORD		CHARGE CODE		IN ACCIDENT	
OFFICER		DATE		TRP/ZONE		DATE	
ON INFORMATION UNDERSIGNED PROSECUTOR CHARGES THE DEFENDANT AND INFORMS THE COURT THAT ABOVE FACTS ARE TRUE AND PUNISHABLE BY		RSMo		CHARGE CODE		IN ACCIDENT	
PROSECUTOR'S SIGNATURE		DATE		TRP/ZONE		DATE	
I PROMISE TO DISPOSE OF THE CHARGES OF WHICH I AM ACCUSED THROUGH COURT APPEARANCE OR PREPAYMENT OF FINE AND COURT COSTS		DR LIC		POSTED		YES	
SIGNATURE X		NO		YES		POSTED	

MO 100-0051 (10-02)

Proof of financial responsibility ☐ YES ☒ NO

WATSON\_00008



## Ferguson Police Department

222 S Florissant Road, Ferguson, MO 63135

## Offense / Incident Report

Report Date 08/01/2012 2017 Type of Incident FAILURE TO OBEY, OBSTRUCTING, RESISTING, ETC. CITY OFFICIAL Complaint No. 12-14370 Case Status CLEARED BY ARREST

Street Address 825 FERGUSON AVE City FERGUSON State Zip Code  
 Sector 4 Precinct 1 Geo 134.0 Ward Latitude Primary Location  
 Neighborhood Jurisdiction Longitude Secondary Location

Received Date / Time 08/01/2012 2017 Call Received Via Dispatched Date / Time 08/01/2012 2017 Call Dispatched As 6100 TRAF VIOL  
 Arrived Date / Time 08/01/2012 2017 Departed Date / Time 08/01/2012 2210 Offense Category TTY Ref.# TeleType Operator

ID	Name	Role	Primary	Arrived Scene	Departed Scene
590	PO Eddie Boyd III 590	REPORTING	<input checked="" type="checkbox"/>		
296	PO/K9 Gregory Casem 296		<input type="checkbox"/>		
486	PO Todd Mink 486		<input type="checkbox"/>		

Charge	Cause Number	Local Code	Jurisdiction	State Statute Type/Class	State Charge Code	Category
FAILURE TO OBEY, OBSTRUCTING, RESISTING, ETC. CITY OFFICIAL		29.16	FERGUSON PD			

MAKING FALSE DECLARATION (M) 575.06 2910099 MB

On 8-1-12 at 2017 hours while patrolling Forest wood Park, located at 825 forest wood, I observed a:

Black 2011 Buick 4door sedan

Reporting Officer 590 PO Eddie Boyd III 590	Approving Officer (I) (Cover Pages Only)
Approving Officer (II) (Cover Pages Only)	



Page 1 of 4 Printed 10/30/2012 1110

**Ferguson Police Department**

222 S Florissant Road, Ferguson, MO 63135

**Offense / Incident Report**Report Date  
08/01/2012 2017Type of Incident  
**FAILURE TO OBEY, OBSTRUCTING,  
RESISTING, ETC. CITY OFFICIAL**Complaint No.  
12-14370Case Status  
**CLEARED BY  
ARREST**

Vine: 1G4GE5EDXBF279655

idling with the headlights on, no front plate, heavy tinted windows and windshield, backed into a parking space along the tree line. The vehicle was facing the obstacle course where several small children were playing unsupervised. As I approached the vehicles location I could make out a subject moving around inside. It should be noted we have had several car break-ins in the above mentioned location with a black vehicle tinted windows.

I exited my marked patrol vehicle and approached the driver's side door where I made contact with the driver, who identified himself as:

Fred Watson  
6' 0", 197 lbs  
1924 W. Laura  
Pensacola, FL.

And advised him of the violations and my observations. I requested his driver's license and proof of insurance to which he advised he did not have his license on him and his insurance card was somewhere in the vehicle he did not know where it was.

Watson became enraged as I attempted to retrieve his pedigree information. He advised he was not doing anything wrong and I had no right to bother him. He said I was violating his 5th Amendment right after I instructed him not to use his cell phone while he was detained for officer safety reasons.

Upon arrival of my assists, PO Todd Mink, DSN 486, I instructed Watson to exit the vehicle so I could pat him down for weapons. He refused to exit the vehicle and after the 5th time of instructing him to exit the vehicle he was advised he was under arrest for "Fail to Obey an Officer" and that if he didn't exit the vehicle he would be tased. He raised his window up and moments later reluctantly exited the vehicle where he was taken into custody and all resisting ceased. After placing him into handcuffs he kicked his driver's door closed in an attempt to lock it as if he were trying to conceal something. The door did not lock and a search incident to arrest revealed his real name was:

Freddie Watson  
115 Monteith  
St. Louis, MO 63137

Reporting Officer	590 PO Eddie Boyd III 590	Approving Officer ( I )
		( Cover Pages Only )
Approving Officer ( II )		
( Cover Pages Only )		

Page 2 of 4

Printed 10/30/2012 1110

WATSON\_00042



## Ferguson Police Department

222 S Florissant Road, Ferguson, MO 63135

## Offense / Incident Report

Report Date 08/01/2012 2017	Type of Incident FAILURE TO OBEY, OBSTRUCTING, RESISTING, ETC. CITY OFFICIAL	Complaint No. 12-14370	Case Status CLEARED BY ARREST
--------------------------------	--	---------------------------	-------------------------------------

5'11, 175 lbs

Watson was additional charged with making a 'False Statement'. It should be noted a REJIS computer check of Freddy Watson revealed no record of an operator's license through Florida, Illinois, or Missouri.

A REJIS computer check of Freddie Watson revealed an 'Expired Operators License' through Missouri that had not been surrendered to another state.

He was conveyed to the Ferguson P.D. where he was booked accordingly.

## Reporting Officer / Complaint

Name (Last, First Middle Suffix) OFFICER BOYD,	Race	Sex F	DOB	Age	Juvenile	SSN	Moniker
<hr/>							
Type	Street Address	City		State	Zip Code	Country	
		FERGUSON		MO	63135	USA	
<hr/>							
Type	Phone	Ext/PIN	Type		Email Address		
BUSINESS		5590					

## Involved Party

Name CITY OF FERGUSON	Type GOV'T	<input checked="" type="checkbox"/> Willing to Prosecute	Rel. to Sus.	UNKNOWN	
<hr/>					
Type	Street	City	State	Zip Code	Country
	110 CHURCH ST	FERGUSON	MO	63135	
<hr/>					
Type	Phone	Ext/PIN	Type	Email Address	
BUSINESS	(314) 524-5173				

## Suspect Information

Name (Last, First Middle Suffix) WATSON, FREDDIE	Race B	Sex M	DOB	Age 32	Juvenile	SSN	Moniker
---	-----------	----------	-----	-----------	----------	-----	---------

Reporting Officer 590 PO Eddie Boyd III 590	Approving Officer ( I ) ( Cover Pages Only )
Approving Officer ( II ) ( Cover Pages Only )	

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WATSON\_00043



# Ferguson Police Department

222 S Florissant Road, Ferguson, MO 63135

## Offense / Incident Report

Report Date  
08/01/2012 2017Type of Incident  
FAILURE TO OBEY, OBSTRUCTING,  
RESISTING, ETC. CITY OFFICIALComplaint No.  
12-14370Case Status  
CLEARED BY  
ARREST

Type	Street Address	City	State	Zip Code	Country
		ST. LOUIS	ND		

Height	Weight	Build	Skin Color	Complexion	Eyes	Type of Eyewear	City	State
511	175				BROWN			
Hair	Hair Length	Hair Style	Beard	Mustache	Side Burns	Mannerisms	Country	
BLACK								
Voice	Teeth	Deformities						

☐ Drugs
 ☐ Alcohol
 ☐ Suspect Identified
 ☐ Suspect Located
 ☐ Suspect Near Scene
 ☐ Serious Repeat Offender

Veh. Year	Make	Model	Veh. Desc.	Veh Style	VIN	Veh Value	Veh Status
2011	BUIC	SADAN			1G4GESEDX6F279655	\$0.00	
Tag	Tag Year	Tag Month	Veh Color-Top	Veh Color-Bottom	Veh Type		

Name	Phone	Ext.	E-Mail	Street No.	Dir	Street/Rt	Apt/Suite	City	St.	Zip

Tow Company	Tow Phone	Tow Phone Ext.	Tow Tag	Tow Fee
FERGUSON SUPER	(314) 869-0050			\$0.00

Reporting Officer	590 PO Eddie Boyd III 590	Approving Officer ( I )
		( Cover Pages Only )
Approving Officer ( II )		
( Cover Pages Only )		

Page 4 of 4

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IF ADDITIONAL SPACE IS NEEDED USE ANOTHER CONTINUATION FORM CC		F-9		2. DEPARTMENT FILE NO.	
1. DEPARTMENT REPORTING		CONTINUATION		12-14370	
Ferguson Police Department		DETAILS STOLEN PROPERTY PERSONS WANTED - ARRESTED - VICTIM - WITNESS		4. Page 1 Of 1 Pages	
3. DATE OF THIS REPORT 08-01-12					
5. VICTIM OR COMPLAINANT City of Ferguson		6. PLACE OF OCCURRENCE 825 Ferguson (Forestwood Park)			

On 08/01/12 at 2017hrs while patrolling Forestwood Park, located at 825 Forestwood, I observed a:

Black 2011 Buick 4dr sedan  
1g4ge5edxbf279655

idling with the headlights on, no front plate, heavy tinted windows and windshield, backed into a parking space along the tree line. The vehicle was facing the obstacle course where several small children were playing unsupervised. As I approached the vehicles location I could make out a subject moving around inside. It should be noted we have had several car break-ins in the above mentioned location with a black vehicle tinted windows.

I exited my marked patrol vehicle and approached the driver's side door where I made contact with the driver, who identified himself as:

Fred Watson  
6'00" 197  
1924 W Laura  
Pensacola, FL

and advised him of the violations and my observations. I requested his driver's license and proof of insurance to which he advised he did not have his license on him and his insurance card was somewhere in the vehicle he did not know where it was.

Watson became enraged as I attempted to retrieve his pedigree information. He advised he was not doing anything wrong and I had no right to bother him. He said I was violating his 5<sup>th</sup> Amendment right after I instructed him not to use his cell phone while he was detained for officer safety reasons.

Upon arrival of my assists, PO Todd Mink, DSN486, I instructed Watson to exit the vehicle so I could pat him down for weapons. He refused to exit the vehicle and after the 5<sup>th</sup> time of instructing him to exit the vehicle he was advised he was under arrest for 'Fail to Obey an Officer' and that if he didn't exit the vehicle he would be tased. He raised his window up and moments later reluctantly exited the vehicle where he was taken into custody and all resisting ceased. After placing him into handcuffs he kicked his driver's door closed in an attempt to lock it as if he were trying to conceal something. The door did not lock and a search incident to arrest revealed his real name was:

Freddie Watson  
115 Monteith  
St. Louis, MO 63137  
5'11" 175lbs

Watson was additional charged with making a 'False Statement'. It should be noted a Rejis computer check of Fred Watson revealed no record of an operator's license through Florida, Illinois, or Missouri.

A REJIS computer check of Freddie Watson revealed an 'Expired Operators License' through Missouri that had not been surrendered to another state.

He was conveyed to the Ferguson PD where he was booked accordingly.

WATSON\_00045



Ferguson, Mo. 8/11/2  
Date

STATE OF MISSOURI )  
City of Ferguson )

IN THE MUNICIPAL COURT OF FERGUSON, MISSOURI CAUSE NO 12-14370

THE CITY OF FERGUSON, PLAINTIFF

DOCKET NO. \_\_\_\_\_

VS

Freddie Watson DEFENDANT

115 Monticelli ADDRESS

NOW COMES City of Ferguson

(ADDRESS) 110 Church

And being duly sworn, on oath, and under penalties of perjury complains that on and or about  
the 1 day of 8 2012 at or near: 825 Ferguson

within the corporate limits of Ferguson, Missouri, the above named  
defendant did then and there unlawfully: Fail to obey an officer - Watson  
refused to provide pedigree information when asked.  
Then refused to exit his vehicle when advised he  
was under arrest.

In violation of Section \_\_\_\_\_ of the revised Code of the City of Ferguson, 1998.  
The undersigned complainant states the facts herein are true and acknowledges that he/she has  
been notified any false statements made herein are punishable by law.

PO [Signature], 390  
Complainant

Subscribed and sworn to before me this \_\_\_\_\_ day of \_\_\_\_\_ 20\_\_\_\_

\_\_\_\_\_  
Municipal Judge or Clerk

The undersigned Prosecutor informs the court on information and belief that the above offense  
herein charged was committed and the facts that form this belief are contained in the above  
statement of facts concerning this matter.

\_\_\_\_\_  
Prosecuting Attorney

Subscribed and sworn to before me this \_\_\_\_\_ day of \_\_\_\_\_ 20\_\_\_\_

\_\_\_\_\_  
Municipal Clerk

PLAINTIFF'S  
EXHIBIT

6

WATSON\_00046

Ferguson, Mo. 11/12  
Date

STATE OF MISSOURI )  
City of Ferguson )

IN THE MUNICIPAL COURT OF FERGUSON, MISSOURI CAUSE NO 12-14370

THE CITY OF FERGUSON, PLAINTIFF

DOCKET NO. \_\_\_\_\_

VS

Freddie Watson DEFENDANT

115 Monticeth ADDRESS

NOW COMES City of Ferguson

(ADDRESS) 110 Church

And being duly sworn, on oath, and under penalties of perjury complains that on and or about the 1 day of 8 2012 at or near: 825 Ferguson

within the corporate limits of Ferguson, Missouri, the above named defendant did then and there unlawfully: false statement - Watson gave a false name after advising he did not have his identification on him. He later said his military ID was in the vehicle he tried to secure before being taken into custody.

In violation of Section \_\_\_\_\_ of the revised Code of the City of Ferguson, 1998. The undersigned complainant states the facts herein are true and acknowledges that he/she has been notified any false statements made herein are punishable by law.

2011/12/12, 590  
Complainant

Subscribed and sworn to before me this \_\_\_\_\_ day of \_\_\_\_\_ 20\_\_\_\_

\_\_\_\_\_  
Municipal Judge or Clerk

The undersigned Prosecutor informs the court on information and belief that the above offense herein charged was committed and the facts that form this belief are contained in the above statement of facts concerning this matter.

\_\_\_\_\_  
Prosecuting Attorney

Subscribed and sworn to before me this \_\_\_\_\_ day of \_\_\_\_\_ 20\_\_\_\_

\_\_\_\_\_  
Municipal Clerk

(9)

WATSON\_00047